



WORTHING LOCAL PLAN 2020- 2036

TOPIC PAPER

HOUSING IMPLEMENTATION STRATEGY

SUBMISSION

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**WORTHING BOROUGH
COUNCIL**

Housing Implementation Strategy

Submission Draft Worthing Local Plan 2020-2036

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Housing Implementation Strategy

Submission Draft Worthing Local Plan 2020-2036

Purpose of this Paper

The delivery of all forms of housing is a crucial issue when preparing a new Local Plan for the Borough. The purpose of this paper is to set how the Council has considered this key issue and the steps that have been taken to maximise the delivery of housing. This includes justification of the approach set out in the Worthing Local Plan and the steps needed to ensure the effective implementation of policy.

The data used for the calculations set out in this draft document are based on the latest published Annual Monitoring Report (AMR) 2019/2020 which can be found on the Council's [website](#).

This paper sets out the context in which the issue of housing delivery has been assessed. It explains the national, regional and local policy expectations together with key national events such as Covid-19 pandemic and Brexit that have contributed to shaping the context. It goes on to set out the physical constraints that limit the borough's ability to meet identified housing needs and, by setting out the historic context in terms of past need and past delivery, explains that this is far from a new problem for Worthing.

The paper goes on to explain how the current proposed target has been derived and all the steps taken to ensure all reasonable opportunities have been realised (a 'no stone unturned' approach'). It sets out what actions are being taken (and will be taken) to ensure that housing is delivered as envisaged and that future opportunities are captured, including taking into account the risks to development not coming forward as planned and the measures that will be used to mitigate. Finally, it concludes that ongoing monitoring and reviews will be essential element to ensuring both opportunities and risks are identified as early as possible with corporate structures and support in place to act swiftly and flexibly.

On the basis of a full a robust assessment the Council concludes that the proposed Submission Draft Local Plan meets the test of soundness.

PART 1 – INTRODUCTION

- 1.1 This Housing Implementation Strategy is being prepared to support the Submission Draft Local Plan 2020 - 2036. It sets out the Council's proposed approach to managing the delivery of housing over the Local Plan period in order to support the housing delivery target set out in the Plan for a minimum of 3,762 dwellings (230 per annum) over the plan period.
- 1.2 National policy expects local authorities to meet the housing need figure derived using the standard methodology. Clear, robust evidence and local justification must be put forward to justify any target lower than that identified through the standard method. To demonstrate this, a 'no stone unturned' approach has been used to ensure that all reasonable opportunities have been explored that best deliver the identified housing need.
- 1.3 The key challenge is to achieve the right balance between planning positively to meet the town's development needs with the continuing need to protect and enhance the borough's high quality environments and open spaces within and around the town. The overarching objective is therefore to maximise appropriate development on brownfield land and add sustainable urban extensions adjacent to the existing urban area.
- 1.4 Delivering much needed homes is a particular challenge for Worthing due to the land constraints that the borough faces. This lack of available land for growth is likely to result in great pressure being placed on many existing land uses. Residential land values are usually significantly higher than other uses so it is no surprise that developers and landowners often promote schemes that would result in the change of an alternative use to housing. Whilst the high levels of housing need must always be taken into consideration, it should not override the need to ensure that the town also provides the right balance of other uses (particularly for jobs, homes and community facilities) to ensure that people have places to work and enjoy their leisure time.
- 1.5 In order to understand the wider needs of the borough a significant amount of evidence has been gathered which includes: an Employment Land Review and Economic Study; Retail Study; and Sport, Leisure and Open Space Study. Evidence findings are clear in that the Plan needs to ensure that, where appropriate, existing uses are protected, this will include the safeguarding of most employment sites and the protection of valued open spaces and community facilities. All studies can be found on the 'Evidence Base' pages of the Council's website.
- 1.6 Given the very significant housing pressures within the town, housing delivery is already a high level corporate and political priority for Worthing, as detailed in the Council's new [Corporate Plan - Platforms For Our Places](#) (most recent update 'Going Places' Dec 2019) and in Council's response to the Covid 19 pandemic (['And then...'](#)). Strong corporate leadership will be an ongoing requirement to ensure housing delivery remains a focus across the Council. The Council is therefore committed to:

- providing a Council wide strategic approach to housing delivery, and ensuring the delivery of new homes is a primary consideration in decision making.
- ensuring existing policies, strategies and other relevant documents and databases are updated and put in place to support housing delivery and are implemented to achieve specific goals.
- ensuring that Councillors are fully aware of the importance of delivering new homes and supporting related policies and strategies.

- 1.7 The Council has already undertaken a significant amount of work to identify the barriers to bringing forward some of the key sites in the borough and will continue to be proactive in searching for additional opportunities to bring forward both existing and new sites.
- 1.8 Delivering much needed development whilst rising to the challenge of climate change is another part of the balance that the Plan must address. Addressing the impacts of climate change is a key overarching priority across all elements of the Plan. A vital challenge for Worthing is to ensure that the area is resilient to the predicted impacts of climate change which can include hotter, drier periods as well as increased rainfall and flood events. In response to the Council's climate emergency declaration (which has pledged to become carbon neutral by 2030) the Plan must support the move towards carbon neutrality and clean energy, and ensure development helps the borough to adapt and increase its resilience to the effects of climate change, now and in the future. New development must utilise sustainable construction techniques whilst adaptation and mitigation measures must improve the resilience of communities, reduce inequality and bring a range of social benefits.
- 1.9 A more recent challenge is the Covid-19 pandemic which has had a significant impact on all sections of society. Whilst it is too early to say how pronounced and long term these impacts might be, it is widely accepted that there will be many implications for the local economy, for transport and for social structures. Like all local authorities, the Council will have to respond positively to support post-Covid recovery. Planning will play an important role in this process and, if anything, the pandemic has emphasised the importance of the Local Plan's role in planning for sustainable, resilient and inclusive outcomes.
- 1.10 In addition, the impact of the UK's withdrawal from the European Union ("Brexit") is uncertain. Brexit will likely have implications for environmental and building standards, access to skilled workers, funding for research and infrastructure projects and the regulatory environment within which it operates.
- 1.11 Although the Local Plan is designed to provide a clear framework for development it must be accepted that, in these uncertain times, there may need to be an even greater requirement for adaptability and flexibility. Furthermore, all policies will be monitored (via the Annual Monitoring Report) on an annual basis to ensure that they remain effective and deliverable. This work will also inform the subsequent review of the Local Plan.

- 1.12 In terms of housing delivery, as stated above, a significant amount of work has been undertaken to assess the number of new homes that can realistically be delivered, taking account of the characteristics and constraints of Worthing. Therefore, the Submission Draft Local Plan sets out a proposed housing delivery target based on what is considered the most realistic housing capacity figure for the borough between 2020 -2036. This capacity figure is based on the most up to date information and evidence at the time of publishing this stage of the plan.

PART 2 – CONTEXT

National Planning Policy

- 2.1 The revised [National Planning Policy Framework](#) (NPPF) February 2019 (para 7) states that the purpose of the planning system is to 'contribute to the achievement of sustainable development'. To achieve this means that the planning system has three overarching objectives:
- An economic objective - to help build a strong, responsive and competitive economy
 - A social objective - to support strong, vibrant and healthy communities
 - An environmental objective - to contribute to protecting and enhancing our natural, built and historic environment.
- 2.2 [National planning guidance](#) places a very strong emphasis on meeting development needs within Local Plans, however this must be balanced against other considerations. When considering the most appropriate spatial strategy local authorities are required to take account of the different roles and characters of their areas. Ultimately, this informs the level of development that can be delivered in a sustainable manner. In turn, this 'balance' influences the overall spatial strategy.
- 2.3 A key challenge set by national policy is the delivery of a significant number of new homes across the country to meet the significant levels of identified need. Each local authority has to demonstrate how it will meet its own objectively assessed needs for housing.
- 2.4 The NPPF requires that strategic policies should set out an overall strategy for the pattern, scale and quality of development, and make sufficient provision for housing (including affordable housing). In order to determine the minimum number of homes needed, the NPPF confirms the strategic policies should be informed by a local housing need assessment, conducted using the standard method in national planning guidance. Strategic policy-making authorities should establish a housing requirement for their whole area, which shows the extent to which their identified housing need can be met over the plan period.

Strategic Context

- 2.5 The Duty to Co-operate places a legal duty on local planning authorities and other public bodies to engage constructively and actively on planning issues which affect more than one local planning authority. In line with this requirement, Worthing Borough Council has worked on an ongoing basis with key partners to consider a range of cross boundary issues.
- 2.6 Worthing Borough Council is a member of the West Sussex and Greater Brighton Strategic Planning Board. The Board has commissioned evidence on a number of strategic studies and has committed to:

- prepare, maintain and update a Local Strategic Statement to provide a broad strategic direction and establish areas for inter-authority co-operation;
- develop and implement a programme for jointly addressing strategic planning and development issues; and
- maintain liaison with the Coast to Capital Local Enterprise Partnership(s) and other relevant bodies.

2.7 This strategic work has influenced the Local Plan, particularly the spatial strategy. A [Duty to Co-operate Statement](#) has been published to accompany the Local Plan. This incorporates a number of Statements of Common Ground (SoCG) agreed between Worthing BC and neighbouring local authorities. The Statements set out details of this process and demonstrate how the requirements of the Duty have been met and how key cross boundary issues have been (and will be) addressed.

2.8 The spatial strategy for Worthing also needs to respond to the sub-regional planning context. In this regard, a key document is the second version of the Local Strategic Statement (LSS2) which has been produced by the Coastal West Sussex authorities together with Brighton & Hove City Council to provide the sub-regional context for delivering sustainable growth for the period 2015-2031. The Statement, which was signed off by the Strategic Planning Board in 2016, sets out the long term strategic objectives and spatial priorities for the coastal authorities to be addressed through a coordinated approach across the area in terms of planning and investment. It sets the following strategic objectives for the area:

- Delivering Sustainable Economic Growth - to promote regeneration in the coastal towns and support the employment needs of the area;
- Meeting Strategic Housing Needs - by the constituent authorities working proactively together and with their partners to meet housing needs;
- Investing in Infrastructure - to address deficits in capacity and to facilitate growth;
- Managing Environmental Assets and Natural Resources - by managing growth, whilst at the same time protecting the designated ecological, and landscape assets.

2.9 LSS2 sets out a number of spatial priorities for the different parts of the sub-region. Spatial Priority 4, that relates to Worthing, seeks to deliver infrastructure and transport improvements required to help stimulate and maximise investment opportunities in the town centre. Priorities include: regeneration of the seafront; improved levels of accessibility and connectivity; regeneration of key gateway sites; increased vitality of the town centre; and the delivery of new employment floorspace at Decoy Farm.

- 2.10 Since the publication of LSS2 the 'geography' of the Strategic Planning Board has been extended and it now represents the local planning authorities of Adur, Arun, Brighton & Hove, Chichester, Crawley, Horsham, Lewes, Mid Sussex, Worthing, together with West Sussex County Council and the South Downs National Park Authority. The Board is currently in the early stages of preparing the third revision to the Local Strategic Statement (LSS3) and there is a clear commitment from all authorities to develop a statement that will develop a long-term and 'deliverable' strategy for the sub-region over the period to 2050. The work being undertaken will explore options for meeting the area's unmet needs for housing, employment and infrastructure. Whilst LSS3 will be a non-statutory strategic planning framework, it will influence all of the constituent Local Plans and will help to guide the future location and delivery of development across the sub-region.
- 2.11 The Strategic Planning Board maintains a close working relationship with the Coast to Capital Local Enterprise Partnership (LEP), particularly in relation to the LEP's priorities included in the Strategic Economic Plan. This is achieved through joint working between officers from the local planning authorities and the Partnership's technical support groups. Similarly, there are close links with the Greater Brighton Economic Board, a partnership across the public and private sectors, which grew from the 2014 City Deal. The Greater Brighton City Region is a functional economic area, stretching from Crawley and Gatwick Airport in the north to Lewes in the east and Worthing in the west. The board's ultimate aim is to attract investment to bring jobs and prosperity to the area.
- 2.12 As explained further within the Duty to Co-operate Statement, there are no easy solutions to meeting housing needs across the sub-region. Some authorities, such as Worthing, have very limited land available for growth and others have significant areas covered by environmental designations or with constrained infrastructure capacity. As a result, most authorities in the sub-region have progressed and ultimately adopted Plans that would not deliver their full housing needs. As such, the opportunity to deliver some of Worthing's unmet needs elsewhere within the sub-region are somewhat limited. Despite this, the Council will continue to work positively with all authorities across the housing market area to assess whether any solutions that would significantly increase housing delivery can be found.

Worthing Context

- 2.13 Worthing is one of the largest towns in West Sussex, with around 110,700 residents and a working population of approximately 60,000 people. Its location on the south coast between the English Channel to the south and the South Downs National Park to the north provides a distinctive and much cherished setting. It is this high quality environment that helps to underpin and support the local economy and which is valued by those who choose to live, study, work and visit here. In turn, this helps to generate an increasing requirement for homes, jobs and leisure uses.
- 2.14 Worthing is a very compact town with a tightly drawn boundary. An increasing population means there is a significant need for growth, particularly with regards to housing, however the South Downs National Park to the North, green gaps to the east

and west and the coastline to the south means that it has been, and will continue to be, difficult for Worthing to meet its identified development needs.

- 2.15 As illustrated on the Land Availability Maps (Local Plan pages 24-25), whilst Worthing measures 33.7 sq. km in area 8 sq. km (24%) of the borough is taken up by part of the South Downs National Park. The existing built up area (22.5 sq. km) takes up the vast majority of the land (88%) within the borough that lies outside the National Park. A further constraint is that much of the residual land (the coastline and narrow and sensitive gaps to the east and west) is not appropriate for development. The Local Plan designates the land to the east and the west of the borough as Local Green Gap and Local Green Spaces (see Topic Paper 2 – [‘Land outside the Built up Area Boundary’](#)).
- 2.16 This limited land availability, infrastructure constraints, areas of flood risk, heritage assets and high quality landscapes around the borough means that there is little room for expansion. A lack of developable land around the town is clearly the crucial factor when considering options for significant growth and a Local Plan’s ability to fully meet the borough’s identified development needs. Put simply, it is the same features we want to protect which, in part, constrain the borough’s ability to grow and develop. The overarching challenge is therefore to strike the balance between taking a positive approach to sustainable development and regeneration against the limited physical capacity of Worthing to accommodate it and the need to maintain a good quality of life for new and existing residents. These challenges are not new (see section 5 below).

PART 3 – HOUSING PROVISION (HISTORIC CONTEXT)

- 3.1 Historically there has not been a strong relationship between housing targets set for Worthing within regional Plans and the need / demand for new dwellings in the borough. This is because previous targets took account of the development physical and environmental constraints faced by Worthing and were therefore strongly influenced by the capacity of the borough to accommodate new homes.
- 3.2 The NPPF now requires that local planning authorities meet their full need for both market and affordable housing as far as is consistent with other policies in the Framework. In response to this significant change, together with other changes at national level, the Council committed to review the existing Core Strategy and progress a new Local Plan.
- 3.3 The current level of identified housing need is 885 dwpa (capped figures as calculated by the national Standard Methodology – full calculation can be found in Appendix 1) for the plan period which is a significantly higher level of housing delivery than the borough has previously planned for or delivered. As set out below, this needs to be seen in the context of previous historic delivery rates and more particularly the current adopted Core Strategy 2011 which set a housing requirement of 200 dwellings per annum.

Worthing Local Plan 2003

- 3.4 Worthing's first Local Plan was adopted in 1994 and its second was adopted in 2003. The housing requirement for the latter plan was established by the West Sussex Structure Plan (WSSP) and this was the context within which the Worthing Local Plan 2003 was prepared. Between 1989 and 2006 the WSSP set the level of housing delivery for Worthing at 6,000 new dwellings. Between 1989 and 1994 (1994 was the base date for the WLP 2003) 1,200 dwellings were built which left a need to deliver 4,800 dwellings between 1994 and the end of the plan period. The plan sought to deliver 3,269 dwellings, a shortfall of 1,531 dwellings. The inspector at the time accepted that it would not be appropriate for the full provision of housing to be delivered over the plan period as the concern would be that it would lead to an over intensive use of urban areas, inappropriate allocation of greenfield sites and also undermine the strategy that would see a sustainable balance between the delivery of jobs and houses.
- 3.5 The Worthing Local Plan 2003 delivered 2,375 dwellings (over a 12 year plan period) so in reality the shortfall against the WSSP target (between 1994 and 2006) was 2,425 over 50% of a target that took account of the development physical and environmental constraints faced by Worthing. The average annual delivery rate over the WLP 2003 period was 197 dw/pa (gross).
- 3.6 It is noteworthy that the West Structure Plan 2001-2016 (para 77) concluded that having undertaken a broad assessment of capacity of the built up area (County level) it showed that no matter how efficiently previously developed land is used, greenfield land would be required to meet the needs identified in that Plan. At that time the

recommended 'target' (high level constraint based as opposed to identified need) set in the Plan was to deliver 4,375 dwellings between 2001- 2016. The targets for each district and borough were then required to be tested through the preparation of the review of the local plans; the development potential of previously-developed land should be optimised by the District and Borough Councils working in partnership with the development industry and local communities to an extent that is compatible with the local character, environment, resources and assets of each area or site. The 2003 Worthing Local Plan undertook rigorous assessments to seek to achieve the 'target' set but as set out above was unable to meet the structure plan target. It is useful to note the Inspectors comment at the 2003 Local Plan inquiry:

'it is now clear that to achieve such levels of house building in Worthing would cause harm to the environment of the Borough either through over-intensive development within the existing urban area or allocation of inappropriate greenfield sites. It would also undermine the sustainable strategy by over-providing dwellings in comparison with jobs, potentially leading to an increase in out-commuting

Worthing Core Strategy 2011

- 3.7 Worthing's current adopted local plan, is the Core Strategy which was adopted in 2011 (plan period 2006 - 2026). The Core Strategy was prepared at the time of the South East Plan (2009) which had replaced the WSSP. The South East Plan set the housing requirements for individual districts and boroughs and the requirement for Worthing was to deliver 4,000 dwellings between 2006 and 2026 (an average of 200 dw/pa). Along with a large development at West Durrington (700 dwellings) a key element of the Core Strategy was to focus on those sites and locations that could deliver regeneration and wider economic and community needs. So far, 4,312 new dwellings have been delivered (from 2006 to 2020) which equates to an average annual delivery rate of 308 dwpa over this period.
- 3.8 Whilst the actual average annual delivery rate since 2006 has been significantly higher (308 dwellings) than the requirement (200 dwelling) it should be noted that there was no intention that the 200 dwelling / year target should be seen as a 'ceiling'. Table 1 below sets out the annual net delivery rates since the adoption of the Core Strategy. The lowest annual delivery was 143 dwellings with the highest at 484 dwellings. Table 1 indicates the recent levels of housing delivery (this is a net figure, which consists of new build dwellings minus demolitions plus conversions).

Table 1 - Historic Housing Delivery

Year	Net Additional Dwellings
2006 – 2007	266
2007 – 2008	260
2008 – 2009	380
2009 – 2010	252
2010 – 2011	241
2011 – 2012	143
2012 – 2013	172
2013 – 2014	245
2014 – 2015	351
2015 – 2016	484
2016 – 2017	347
2017 – 2018	482
2018 – 2019	293
2019 - 2020	396
Total 2006 – 2020	4,312

- 3.9 When setting housing requirements, the borough's significant level of constraint was acknowledged by the South East Plan (SEP). In 2009 the House of Commons South East Regional Committee report looked into the level of housing targets in the SEP given the then low level of housebuilding and in particular the low levels of affordable homes being delivered. It looked at the underlying reasons for the numbers put forward and the consequences for not meeting any decided targets. It took account of the then economic downturn, the need for affordable housing, infrastructure requirements, meeting the different housing needs of the communities, achieving low carbon housing, ageing population and the environmental and land constraints. One of the recommendations to come out of this report was:

'We recommend that annual targets be retained as a key performance target, since they provide a useful benchmark, provided that they are reviewed on a regular basis and recognised as averages that will not necessarily be met every year. In disaggregating the regional target to local authority areas varying local circumstances must necessarily be taken into account, but some regional oversight is necessary still to ensure that local areas address such variability in consistent ways. We acknowledge that opportunities for future house building should continue to be limited in the more environmentally sensitive parts of the region and in coastal areas and that more work be put into identifying these areas at a regional level.'

Summary

- 3.10 The significant challenges faced by the borough and therefore its inability to achieve significant levels of housebuilding has been demonstrated and accepted at different levels of the plan making process (local / county / sub-regional) and through a number of changes to the planning system.
- 3.11 The historical context helps to confirm that a consistent reason why a constrained figure has always been accepted is the lack of available land. Whilst there are many things the Council can do to boost housing supply (see later sections of this Paper) the one thing it can't do is create new land. In this regard, 'building out to sea' has been one option that has been previously tested but, perhaps not surprisingly, the costs and environmental impacts make this an unviable and unsustainable solution.
- 3.12 It is also very clear that the ability for the borough to meet the identified 'need' has always been a significant challenge. The borough has always experienced a high level of 'need' and the gap between 'need' and 'supply' is not a new one. A 2014 housing study 'Assessment of Housing Development Needs Study: Sussex Coast Housing Market Area' assessed a number of different growth scenarios for the Borough indicated a minimum of 600 dwpa which increased to 679 dwpa when it took into account the latest available demographic evidence at that time. The subsequent study the Worthing Housing Study (June 2015) which built on previous studies (SHMA) and provided the most up-to-date and robust picture of need concluded that the full Objectively Assessed Need (OAN) for Worthing was 636 dwpa.
- 3.13 Since then there have been significant changes at national level with a clear emphasis on meeting identified 'need' and the need to meet, as much as possible, the housing need for Worthing. The Government has also introduced a new method of assessing a local authorities housing delivery with specific consequences for under delivery. This is known as the Housing Delivery Test. This paper now explains what this means for Worthing in terms on housing needs and the considerable efforts that have been taken to try to deliver as much of this as is possible (and sustainable).

PART 4 – ASSESSING HOUSING NEED

Background

- 4.1 As previously outlined, previous housing requirements for Worthing were, in summary, the ‘policy-on’ figures that had already taken development constraints into account. However, the NPPF now requires that local planning authorities meet their full need for both market and affordable housing as far as is consistent with other policies in the Framework. In response to this significant change, together with other changes at national level, the Council committed to review the existing Core Strategy and progress a new Local Plan.
- 4.2 In spring 2016 the first stage of Local Plan review ([the Issues and Options stage](#)) was published for consultation. At that stage the Council sought views and suggestions on how Worthing should grow and develop in the future. This consultation identified the challenges facing the borough and the options that could help address them. All responses received at the Issues and Options stage informed the next stage of Plan preparation and the evidence that needed to be put in place to support it. In autumn 2018 the Council published its preferred options in its [Draft Worthing Local Plan 2018](#). This Submission Draft Local Plan builds on the responses received at the two earlier stages and the emerging evidence.

Overarching Approach

- 4.3 In line with the NPPF, the Council is seeking to plan positively to establish whether housing delivery could be increased significantly to help close the gap between the level of identified need and recent levels of housing delivery.
- 4.4 The spatial strategy set out in Policy SS1 of the Submission Draft Local Plan, seeks to achieve the right balance between planning positively to meet the town’s development needs (particularly for jobs, homes and community facilities) with the continuing need to protect and enhance the borough’s high quality environments and open spaces within and around the town. The overarching objective is therefore to maximise appropriate development on brownfield land and add sustainable urban extensions adjacent to the existing urban area. The core principles set out in the Plan take account of the characteristics of the borough and provide a clear direction for development in and around the town. The spatial strategy will help to steer new development to the right locations whilst at the same time helping to protect those areas of greatest value / sensitivity.
- 4.5 One key consideration when preparing a Local Plan is the ability for infrastructure to meet the needs of development. The NPPF requires Local Planning Authorities to work with other authorities and providers to assess the quality and capacity of infrastructure and its ability to meet forecast demands. Informed by an [Infrastructure Delivery Plan](#) (IDP) the policy must plan positively for the development and infrastructure required in the borough. Details of the IDP can be found on the evidence base pages on the Council’s website.

- 4.6 The retention of existing essential infrastructure and the provision of additional facilities and services to support new development is a key objective of the planning system. Therefore, in order to promote sustainable future growth, infrastructure must be provided in a timely and effective way to address the demands arising from existing and new communities.

Calculating Housing Need

- 4.7 In recent years the way in which housing figures are derived has changed significantly. The National Planning Practice Guidance establishes the Standard Method for calculating overall Housing Need. This confirms that the overall housing need is a starting point for determining the final housing requirement for an area and the figure will need to be updated during the course of a Plan's preparation to take into account any updates to the data inputs:

"Housing need is an unconstrained assessment of the number of homes needed in an area. Assessing housing need is the first step in the process of deciding how many homes need to be planned for. It should be undertaken separately from assessing land availability, establishing a housing requirement figure and preparing policies to address this such as site allocations." (PPG Para 001)

'The standard method... identifies a minimum annual housing need figure. It does not produce a housing requirement figure.' (PPG Para 002)

"Strategic policy-making authorities will need to calculate their local housing need figure at the start of the plan-making process. This number should be kept under review and revised where appropriate."

"The housing need figure generated using the standard method may change as the inputs are variable and this should be taken into consideration by strategic policy-making authorities." (PPG Para 008)

- 4.8 The Government has advised that the 2014 based figures (published 2016) and not the latest 2016 based figures (published 2018) should now be used for calculating the Standard Methodology. The 2014-based household projections are used within the standard method to provide stability for planning authorities and communities, ensure that historic under-delivery and declining affordability are reflected, and to be consistent with the Government's objective of significantly boosting the supply of homes.
- 4.9 Using the Government's methodology, Appendix 1 of this paper sets out how the housing need figure for Worthing (using the Standard Methodology) has been calculated. This includes the need to apply the affordability ratio (with adjustment factor) and a cap. The housing need figure for the borough over the Plan period is shown to be **885 dw/pa.**

Strategic Housing Market Assessment (SHMA)

- 4.10 Although the housing need figure is set nationally (and then adjusted locally) the NPPF also requires the size, type and tenure of housing needed for different groups in the community to be assessed and reflected in planning policies. This includes (but is not limited to) those who require affordable housing, families with children, older people, students, people with disabilities, service families, travellers, people who rent their homes and people wishing to commission or build their own homes.
- 4.11 In order to understand the needs of the different groups of the community of Worthing the Council commissioned consultants to undertake a Strategic Housing Market Assessment (SHMA) to inform emerging policies and to inform development management activities including the housing mix sought through planning applications. The full details of this report can be found on the Council's website.
- 4.12 This study considers needs both aligning to the standard method 880 dwpa (as derived from the standard method using 2014 household projections as at 2019) and to a dwelling-led scenario which reflects the average expected delivery drawn from the housing trajectory for Worthing of 246 dwpa over the period to 2036 (the Draft Worthing Local Plan target). These take account of realistic assumptions on land supply.
- 4.13 The study found that the existing housing stock is characterised by an above average proportion of smaller 1- and 2-bed properties (which account for 50% of the stock in Worthing) and trends in new development since 2011 have seen even higher proportions of smaller dwellings. This contributes to above average levels of overcrowding and constraints growth in family households; but is a reflection of the geography and land supply constraints evident in the area. Affordability pressures are high in Worthing and notably above the South East Average.
- 4.14 The report sets out clear recommendations relating to the different housing needs identified through the study.

Affordable housing

- 4.15 The SHMA report includes an updated assessment of affordable housing need which responds to the widened definition of affordable housing set out in the 2019 NPPF. This includes households who might be able to rent a home in the private sector without financial support but aspire to own a home and require support to do so.
- 4.16 The Strategic Housing Market Assessment has found that 1,164 households in Worthing are currently in affordable housing need (i.e. who are unlikely to have sufficient income to afford private rented housing). In addition, around half of newly-forming households will be unable to afford market housing (i.e. private rented housing) together with another 131 existing households each year, who will through changing circumstances, find themselves in need of affordable housing. This results in a

substantial need for additional affordable housing with a total need for 490 dwellings per annum in Worthing.

- 4.17 The analysis found 85% of the affordable housing need in Worthing is for rented affordable homes, and within this provision of homes at social rent levels which are affordable to those on lower incomes (including lower income working households) with the greatest relative needs and who do not have access to other housing options; and the Councils have a statutory duty to address homelessness. Therefore to most effectively meet the borough's housing needs, the Council will therefore prioritise rented affordable homes at social rent levels by requiring that the total provision of affordable housing should consist of a split of tenures of at least 75% social / affordable rented housing and 25% intermediate housing.
- 4.18 The Council has acknowledged the significant shortfall in affordable housing and as part a wider range of measures to address this issue it has set up a cross service group to address the significant shortfall of affordable housing provision across the borough. The primary focus of the affordable homes delivery group is to identify opportunities for the delivery of affordable homes through more efficient use of Council owned land, together with the acquisition of land and premises for redevelopment.

Housing Delivery Test

- 4.19 The revised NPPF includes the Housing Delivery Test (HDT) whereby Local Planning Authorities must measure net additional dwellings provided in its local authority area against the homes required, using national statistics and local authority data. The HDT assesses the number of homes built in local authority areas over the previous three years and compares these against local housing requirements. Local Planning Authorities that fail to meet delivery targets are required to take appropriate action to address under delivery.
- 4.20 The Ministry of Housing, Communities and Local Government published the first Housing Delivery Test results for each local authority in February 2019. Worthing Borough Council scored 93% with an under delivery of approximately 100 homes over the previous three years (covering 3 monitoring periods 2015 to 2018). As a consequence of the HDT result (delivery under 95% is the 'trigger'), the Council was required to prepare an Action Plan which was published in August 2019.
- 4.21 The second Housing Delivery Test was published on 13th February 2020 and Worthing scored 54%, with an under delivery of approximately 950 homes over the last three years (covering 3 monitoring periods 2016 to 2019). As a consequence of the HDT result, the Council was required to prepare an Action Plan (August 2020) and to add a 20% buffer to the five year housing land supply calculation. The Action Plans can be found on the Council's website here:
- <https://www.adur-worthing.gov.uk/planning-policy/joint-aw/hdt-action-plan/>
- 4.22 The third Housing Delivery Test has recently been published (19th January 2021) and Worthing scored 52% with an under delivery of 1,113 homes over the last three years

(covering 3 monitoring periods 2017 to 2020^{*i}). As a consequence of this latest result means that the Council will become subject to the 'Presumption in favour of sustainable development'.

*Note - *For the 2020 measurement, there is a reduction in the period for measuring total homes required – usually this would be measured over a three-year period but an 11-month period has been used for the 2019/20 monitoring year. This is to account for disruption to housing delivery and monitoring caused by restrictions announced on 23 March 2020, in response to the COVID-19 pandemic*

PART 5 – DELIVERY STRATEGY

- 5.1 The spatial strategy as set out in the Core Strategy (2011) was set by its context. There was one strategic allocation identified in the plan - West Durrington - which was to deliver 700 new homes on a greenfield site situated on the north western edge of Worthing. This site has planning permission and construction is nearing completion. In addition, the Council identified 12 Areas of Change (AOC) these were areas where change was expected and were promoted over the Plan period. Eight of the AOC included residential development either solely or as part of a mixed-use development.
- 5.2 A number of the AOC identified in the Core Strategy have been, or are currently being delivered. The remaining Areas of Change have been reassessed as part of the current Local Plan review and some of these are now allocations. In addition to the sites set out in the Core Strategy, a number of other sites have been, and are being, developed having secured planning permission.
- 5.3 The Council has been using the adopted Core Strategy housing policies since 2011 (adoption 12 April 2011) and housing delivery had been against the target in that plan. The most recent [Annual Monitoring Report](#) (AMR) 2019 - 2020 reports housing delivery against the target as set out in the Core Strategy which is 200 dwellings per annum (dpa).

Housing Supply

- 5.4 The Local Plan target has been informed by a number of studies, evidence documents and monitoring reports. It should be noted that many of the elements that make up the Housing Supply for the Draft Plan are based on data derived from the Annual Monitoring Report 2019 - 2020 (which includes sites assessments from the Strategic Housing Land Availability Assessment Update 2020). West Sussex County Council (WSCC) provides annual monitoring information on much of the data relating to housing supply. Current housing supply is made up of the following sources:

Strategic Housing Land Availability Assessment (SHLAA)

- 5.5 The Council's Strategic Housing Land Availability Assessment (SHLAA) has provided the main mechanism through which the quantity and suitability of land potentially available for housing development has been determined. Following a comprehensive review of all development opportunities, the first SHLAA for Worthing was published in 2009 to help inform the Core Strategy. The SHLAA was subsequently reviewed and updated through the Annual Monitoring Report. However, to inform the preparation of this Local Plan and ensure that the methodology conformed to prevailing guidance a more thorough review of the SHLAA was undertaken in 2014. Updates have since been published annually within the AMR and during this period, there have been several 'calls for sites' exercises where landowners and developers were invited to put forward sites for consideration. It should be noted that like most authorities, Worthing Borough Council suggest a time period within which sites should be promoted. However, as housing need is so great in Worthing and site opportunities so limited the

reality is that the 'call for sites' never closes and interested parties are encouraged to submit potential sites for consideration at any time.

- 5.6 The most recent formal 'call for sites' exercise was undertaken by the Council in early 2020. The results of which were analysed, and have been included in the most recent SHLAA published in December 2020 which can be viewed here:
[Strategic Housing Land Availability Assessment Dec 2020](#)
- 5.7 At the same time a consultation on a revised SHLAA methodology was undertaken to address the updated NPPF requirements and revised SHLAA methodology. A note setting out responses received, and the minor changes made to the methodology can be found on the Council's website.
- 5.8 The housing supply calculations for the Submission Draft Local Plan uses data set out in the most recent published Annual Monitoring Report 2019 - 2020. Appendix 2 sets out the sites are considered to offer the potential to deliver housing development over the plan period.

Commitments

- 5.9 These are large sites of 5 or more dwellings and small sites of 4 or fewer dwellings that have extant planning permission and which are either under construction or have not yet started. The large identified sites are listed in Appendix 3.
- 5.10 West Sussex County Council provide the housing data for the authority and (in partnership with Worthing BC) undertake an assessment of the likely delivery of small sites. WSCC assume that all dwellings under construction and 45% of those permitted but not started will be built in the first five years. This represents a take up rate of about 55% on all small sites in the county as a whole (based on historic completion data across the county). A monitoring assessment undertaken by WSCC has indicated that a more realistic discount rate for Worthing is around 40% (i.e. a 60% implementation rate). However, for consistency, the County Council continues to apply the county wide figure for all authority areas as this reflects the average rate of 'non-implementation'.
- 5.11 If the more realistic rate of implementation (based on detailed analysis undertaken by WSCC in 2013) was applied to Worthing data for 2020 there would be justification in assuming an additional 37 dwellings may come forward for development in a 5 year period. Further, more detailed and up-to-date assessment is currently being carried out by WSCC and the findings will influence future housing land supply assumptions. However, at this stage, and to ensure consistency, Worthing BC will continue to apply the existing discount rate which, in reality, will help to provide a degree of flexibility / contingency as the likely delivery rate from this part of housing supply is likely to be slightly higher than forecast.

Windfall allowance

- 5.12 A windfall allowance may be justified in the anticipated supply if a local planning authority has compelling evidence as set out in paragraph 70 of the National Planning Policy Framework.
- 5.13 Para 70 of the NPPF states *'Where an allowance is to be made for windfall sites as part of anticipated supply, there should be compelling evidence that they will provide a reliable source of supply. Any allowance should be realistic having regard to the strategic housing land availability assessment, historic windfall delivery rates and expected future trends. Plans should consider the case for setting out policies to resist inappropriate development of residential gardens, for example where development would cause harm to the local area.'*
- 5.14 Historically, given the built up nature of Worthing, a significant proportion of housing development has come forward on small sites, which it is not possible to identify in advance, and comprise infill sites, conversions and changes of use. These sites fall below the size threshold for sites to be included in the SHLAA.
- 5.15 Appendix 4 sets out in more detail how the projected windfall allowance has been calculated based on historic trends for small site completions from 2006 (the base date of the Core Strategy) to 2020 it shows an average of 67 dwellings being completed on small sites per annum. Whilst the figure fluctuates from year to year, there is no clear trend that would suggest there might be an overall decline in completions and, as such, it is considered that there is compelling evidence to extrapolate these forward based on past evidence of delivery. To avoid double counting with the small sites commitments, the windfall allowance is not applied to the first three years of the projections. These small windfall sites are sites of less than 5 dwellings (prior to 2019 this was less than 6) and as such fall below the size of site or capacity of site that would be allocated for development, therefore the adoption of the local plan should not have a negative impact on the future rates of delivery. In addition, there is no evidence to suggest that the type of site that make up these windfalls are no longer available and therefore there is no reason to adjust the windfall forecasts down.
- 5.16 The sites that make up the small windfall calculation typically comprise change of use, residential conversions, residential extensions, non-residential redevelopment and residential redevelopment. In the last monitoring year 14 of the completed developments resulted from change of use applications and 10 from residential conversions. The Government has already introduced additional Permitted Development rights and more are being considered. These further flexibilities provide even greater opportunities for developers to bring forward residential development. By their very nature, this type of ad-hoc development is very hard to predict or plan for but they are bound to contribute towards the delivery of windfall development in the borough over the Plan period. In fact, for this reason, there would be some logic in increasing the forecast delivery rate from this source – however, the Council has taken the view that at this stage the rates established are robust, evidence based and realistic. This will be reviewed annually.

Development Sites

- 5.17 The Submission Draft Local Plan proposes the allocation of 15 sites to deliver housing, or mixed uses including housing or employment uses. Of these, 12 are expected to deliver housing solely housing or housing as part of a mixed use development. These sites are considered to be 'deliverable' meaning they are viable, available and offer a suitable location for development. An assessment has been made as to when these sites are likely to be delivered during the life of the Plan. To inform the Council's five year housing land supply assumptions, an indication has been given as to whether a site is expected to be delivered in the first five years of the Plan or, if they are less advanced, within five to fifteen years.
- 5.18 Whilst the Plan provides similar information on the expected level and type of development for all sites, it is inevitable that there is more detail provided for the sites to be delivered in the short term and that there may be some degree of change for the sites that are expected to be delivered in the longer term.
- 5.19 The site allocations in the Plan include some sites with current planning permission where development has not yet commenced. As there is no guarantee that sites with planning permission will be developed (particularly in the current economic climate), the general approach taken is that such sites are included in this Plan as allocations in order to establish the principle of development that will be acceptable should consented schemes not proceed.
- 5.20 Whilst the allocations closely reflect the consented schemes they are not necessarily exactly the same in terms of their proposed uses and capacity assumptions. However, the allocation provides a clear indication as to what is considered to be suitable for the site and a slightly different use may be considered more appropriate in the future in the event that a planning permission is not implemented. In some instances the proposed capacity figures (which are intended to be seen as a minimum) are slightly lower than the permitted schemes. This is in part due to the nature of the sites in question and the potential for variations from the proposed to a completed scheme. However, conversely some of the other allocations which, once a more detailed assessment of design and massing, are likely to deliver a higher final capacity than forecast in the local plan. A list of the proposed allocations including the expected capacity and delivery timescales can be found in Appendix 5.

10% of housing requirement on small sites

- 5.21 The NPPF requires that at least 10% of the housing requirement should be on sites no larger than one hectare. As previously stated the objectively assessed need set out in the Submission Draft Local Plan is 14,160 dwellings over the Plan Period (2020-2036) which currently equates to 885 dwellings per annum. With the identified housing requirement of 14,160 dwellings over the proposed lifetime of the Local Plan, this would require sites to be identified for 1,416 dwellings to come forward on sites of 1 hectare or less in size.

- 5.22 For reasons that are explained within this document and within the Local Plan, the significant constraints in and around the borough means that the Council will not be able to meet its objectively assessed housing needs in full. Even after taking a very positive approach to development, only approximately 26% will be met. Whilst the NPPF is not clear on this matter it would clearly not be sensible to plan to meet 10% of the housing requirement on small / medium site allocations within a Plan in such a constrained area. Doing so would restrict the mix of sites coming forward and, if applied strictly, may even prevent the allocation of some of the few larger development opportunities in the Borough.
- 5.23 As such, it is more sensible to consider what proportion of planned development is small / medium in scale. The Plan will deliver a minimum of 3,672 dwellings (230 annual target) from various sources. Therefore, when assessed against actual supply based delivery the 10% small site requirement (under 1 hectare) would equate to 367 dwellings.
- 5.24 The NPPF is clear that this 10% allowance can include a combination of the development plan (i.e. site allocations, completions, extant permissions and windfall allowance) and any other sites in brownfield land registers. A significant proportion of housing supply will come forward on small sites over the Plan period. In part, this reflects the character of the borough and the very limited number of sites that could provide large scale growth (over 1 hectare). In this regard, 4 of the 15 site allocations included in the Plan are less than 1 hectare in size (in fact 9 of the 15 sites are under 3 hectares). These 4 allocations are expected to deliver 330 dwellings which represents 9% of the proposed total local plan target on sites of 1 hectare or less. When you then add on the existing commitments, smaller SHLAA sites, small windfall sites (less than 5 dwellings) it is clear that the proportion of supply on small sites will be significantly higher than the 10% requirement. Furthermore, changes in planning policy at the national level (new Permitted Development Rights etc) are likely to further increase the delivery of housing on small sites.

Current Housing Position at 1 April 2020

- 5.25 The following table sets out the realistic supply identified as at 1/04/2020

Table 2 - Sources of Housing Supply at 1/04/20

Sources of Housing Supply at 1/04/20	Number of Dwellings
Completions (net)	0
Commitments - WSCC Final data for net commitments as at 1/04/2020 Includes Housing Land Supply sites (5+ dwellings)* and small sites	909

Windfalls = 67 dwellings pa First 3 years not included to avoid double counting: 67 x 13 = 871	871
SHLAA Sites (not including those incorporated as allocations)	139
Local Plan Allocations Latest projections for site allocations over the whole plan period. Note - this includes the HMRC site which is actually 'committed'.	1,753
HOUSING SUPPLY (From all sources) 2020 - 2036)	3,672

*excludes HMRC allocation as this is included within Local Plan Allocations.

Housing Trajectory for the Submission Draft Local Plan

- 5.26 The NPPF requires local authorities to prepare a housing trajectory to illustrate the expected rate of delivery for the Plan period.
- 5.27 This Draft Housing Implementation Strategy includes the housing trajectory for the Local Plan period 2020-2036 (See Appendix 6). This trajectory has a base date of 1st April 2012. The housing trajectory once adopted will be monitored and updated on an annual basis through the Council's Annual Monitoring Report (AMR). The annual update of the Worthing Strategic Housing Land Availability Assessment (SHLAA) will also be reported through the AMR.
- 5.28 The trajectory included in this Draft Housing Implementation Strategy is based on the housing monitoring position at 1st April 2020 and the SHLAA Update 2019/20, published in December 2020 and sets out the expected rate of delivery over the Plan period. It is based on current commitments on both large and small sites (as at 1 April 2020), proposed strategic allocations as set out in the Plan and an allowance for small windfall sites.
- 5.29 The proposed housing target is for a minimum of 3,672 dwellings to be delivered between 2020 and 2036 as set out in Policy SS2 of the Submission Draft Local Plan (2020) and which results in an annual average of 230 dwellings per annum.
- 5.30 The trajectory indicates that the Council can meet this overall housing target with a continuous supply of land coming forward for development. There is a peak in delivery in the first five years of the plan. This is because the information available on the sites allocated within the Plan at this point in time indicates delivery (fully delivered) within the first five years of the Plan for those sites that are being proposed for allocation. Delivery rates will reduce during the latter part of the Plan period. This is in part due to the reduced certainty of identifying sites that far into the future and there may be an issue in maintaining a continuous supply of available land for housing towards the latter

part of the Plan period. Annual monitoring will highlight any such issue and appropriate intervention measures may be required as set out in the Overall Risk to Housing Delivery and Contingencies sections below. Furthermore, a review of the Local Plan (to be undertaken within five years of adoption) will allow any 'new' opportunities to be considered and potentially allocated.

Housing Delivery - 5 year housing land

- 5.31 The NPPF requires Local Planning Authorities to identify and update annually a supply of specific deliverable sites sufficient to provide five years' worth of housing against their housing requirements with a buffer of 5% to ensure choice and competition or a 20% buffer where there is a record of persistent under delivery. Worthing had consistently delivered sufficient new homes to meet the adopted Core Strategy housing targets (200 dwellings / annum) and, for this reason, it had been considered that the 5% buffer was the most appropriate figure to use. However, with the introduction of the Housing Delivery Test and the Local Authority's failure to deliver against the targets it set the Council is required to add a 20% buffer to the five year housing land supply calculation.
- 5.32 The key purpose of the housing trajectory is to assess whether the Council's housing delivery strategy is delivering the required number of homes within appropriate timescales and to maintain a rolling five-year housing land supply.
- 5.33 This Housing Implementation Strategy identifies a supply of sites, which are considered deliverable and developable within the five-year timeframe 2020-2025.
- 5.34 Monitoring of housing delivery will be reported through the Council's Annual Monitoring Report to be published in December each year (to cover the previous financial year).
- 5.35 Appendix 7 sets out the five year housing land supply position for Worthing as at 1 April 2020 applying a 20% buffer as required through the HDT and for completeness a 5% buffer position is also included.
- 5.36 For comparison the five year housing land supply position against both the target of 246 dwpa as set in the DWLP and one based on the government standard methodology for assessing local housing need which requires delivery of 885 dwellings (capped) also applying a 5% buffer, can be found in the latest [Annual Monitoring Report 2020 \(published December 2020\)](#) .

Housing Target

- 5.37 It is important to reiterate that historically the housing targets for Worthing had been based on those set by Regional / Structure Plans and as previously explained, these did not have a strong relationship with the need and demand for new homes in the borough. Since the adoption of the Core Strategy, Worthing had been meeting its adopted target of 200 dwpa and in fact had been delivering a surplus. However, it is acknowledged that this wasn't the case when the newer requirements of the NPPF

were in place which required local planning authorities to seek to meet their housing needs in full (Objectively Assessed Need).

- 5.38 This paper has already analysed the historic rates of delivery since 1994 and more recently, examined the delivery rates since the base date of the Core Strategy (CS). The average annual delivery rate over the last 14 years of the CS has been 308 dwellings but within that period there has been significant fluctuation with the lowest delivery of 143 dwellings and the highest being 484 dwellings. A significant factor influencing the overall delivery over this period has been the delivery of the strategic site at West Durrington (site capacity 700 dwellings with only 23 left to complete) and an increase in unidentified dwellings in part due to factors such as a number of 'office to residential' developments permitted developments (first introduced in 2013).
- 5.39 In order to arrive at a realistic target for this Submission Draft Plan, consideration was given to historic delivery rates and the supply of sites following a robust assessment of all opportunities. Table 2 above sets out the sources of housing supply as at 1st April 2020.
- 5.40 Therefore, the Submission Draft Local Plan proposes an annual delivery target of 230 dwellings based on the most up to date and realistic supply calculations over the Plan period.
- **ANNUAL TARGET** (2020 - 2036) 3672 (total supply at 1/04/20) divided by 16 years of plan = 229.5 dwpa – rounded **230 dwpa**
- 5.41 The table 3 sets out the level of delivery expected based on the minimum annual housing need figure and the requirement over the lifetime of the plan against what the Council considers to be the most robust and realistic delivery based on the assessment of supply. It is clear that there is a significant shortfall and despite the Council taking a very positive approach to development the Plan is only able to meet 26% of the identified need.

Table 3 - Summary

Summary	
Minimum annual housing need figure (capped) for WLP period 2020-36	885
Total dwellings required over plan period (16 x 885)	14,160
WLP Total supply (as at 1/04/20)	3,672 (230 pa)
Shortfall against need (14,160 - 3,672) =	10,488 (655 pa)
WLP delivery as a % of overall need	26%

PART 6 – A POSITIVE APPROACH TO DEVELOPMENT

- 6.1 The Council recognises that the proposed housing target in the Submission Draft Local Plan falls significantly short (74%) of the identified local housing need as assessed through the Standard Methodology. Whilst the Council are confident that the proposed target is the most realistic given the rate of historic housing delivery and in light of the significant constraints the borough faces, it is also committed to undertaking positive and regular reviews to ensure that all potential opportunities are identified, robustly assessed and delivered expediently. There are a number of actions that have been (and will continue to be) undertaken to ensure that both additional sites and development opportunities are identified and also to ensure that potential barriers to development are reduced or removed. In no particular order, these include the following:

ACTION 1 – Site allocations (in the built up area)

- 6.2 As already explained, a key part of the overarching strategy is to maximise development on brownfield land and create sustainable urban extensions adjacent to the existing urban area. This will be achieved, in part, through the allocation of sites for development in the Local Plan. All sites included in this section have been assessed in detail through the Council's Strategic Housing Land Availability Assessment (SHLAA) and the Local Plan Sustainability Appraisal. Supported by these documents and other evidence, a conclusion has been reached that they should be allocated for development.

ACTION 2 – 'Early' release of greenfield sites

- 6.3 Against the backdrop of significant and growing housing need the Council has taken, where possible, positive steps to bring forward sustainable opportunities to deliver new development. Whilst the progression of the Local Plan provides the main mechanism through which sites will be allocated, the Council has also considered ways in which housing delivery can be increased in advance of plan adoption. In response to this, development at two edge of town opportunities (Fulbeck Avenue and Land North of West Durrington) have been given support in advance of the adoption of the new Local Plan. These greenfield sites which sit within the existing built up area boundary, were included in the earlier Local Plan consultation 'Issues and Options' which raised the question of bringing these two sites forward in advance of the new Local Plan. In general the proposed approach was positively received. Since that time planning permission has been approved for development of the Land at west Durrington site (Planning Ref AWDM/1882/16 approved 18/12/2019) and permission has been granted (Planning Committee 21/10/20) pending the signing of a legal agreement for the Fulbeck Avenue site (Planning Ref AWDM/0166/20).
- 6.4 As these sites were not allocated for development in the Core Strategy the Council could have simply waited for the adoption of a new Local Plan to progress them. In effect, this would have allowed the Council to formally allocate a higher number of dwellings as part of the Council's delivery strategy. Whilst this might have helped the

'narrative' for the new Plan the Council's view was that the housing needs in the borough were so great that, as an exception, these two greenfield sites within the existing built up area should be progressed in advance of the Plan. This clearly demonstrates the Council's overarching support for the delivery of sustainable housing sites.

ACTION 3 - Positive Review of all edge of town opportunities

- 6.5 It was clear at an early stage of the local plan process that despite the Council taking a positive approach to its review of potential opportunities within the built up area boundary, there was no prospect of all of Worthing's identified housing needs being met. Therefore the Council undertook a positive assessment of the potential for all edge of town sites.
- 6.6 Given the lack of opportunities in the borough the only realistic option for growth (beyond those sites already tested through previous Strategic Housing Land Availability Assessments) were greenfield extensions, and even these opportunities are limited within the context of Worthing. A total of nine edge of town sites were identified through both the "Call for Sites" exercise and desktop research. It was acknowledged in earlier iterations of the SHLAA that the level of evidence required to inform the consideration of these edge of town (often greenfield) opportunities would need to be much more robust than that expected for the previously developed sites where, in general there is presumption in favour of sustainable development.
- 6.7 The Council therefore committed to gathering more detailed and specific evidence to inform the assessment of these opportunities. These sites have been assessed against the criteria in this SHLAA alongside the Sustainability Appraisal and various evidence studies. This took account of a range of identified issues and constraints including: biodiversity; flood risk; transport; landscape; and infrastructure capacity. One of the key studies undertaken was the Landscape and Ecology Study of Greenfield Sites (2015 & 2017).
- 6.8 The conclusion of this comprehensive and positive assessment has resulted in the allocation in the Submission Draft Worthing Local Plan of five residential sites and one employment site. These sites will make an important contribution towards meeting some of the boroughs development needs. Robust evidence has also demonstrated that there are areas on the edge of town that are not suitable for development and this has helped inform the Spatial Strategy and associated policies (see Topic Paper 2 – 'Land outside the Built Up Area').
- 6.9 It should be noted that at the Regulation 18 Draft Local Plan stage two of the edge of town greenfield opportunities were included as 'Omission Sites' (Titnore Lane and Beeches Avenue). These were sites which had some development potential, but that at that stage sufficient and robust evidence had not been submitted that provide confidence that the identified constraints could be overcome in order to provide the necessary delivery certainty to justify allocation. Particular issues relating to these sites were: access; ancient woodland and the proximity of the South Downs National Park. Work undertaken to review these two sites since 2018 has indicated that with

appropriate mitigation there is no reason why they should not be allocated in the Plan to meet some of Worthing's housing needs. The approach taken with these sensitive sites again demonstrates the Council's desire to ensure that all opportunities are positively and robustly reviewed.

ACTION 4 - Reassessment of Strategic Housing Land Availability Assessment (SHLAA)

- 6.10 A Strategic Housing Land Availability Assessment (SHLAA) identifies the housing potential of sites within Worthing. It helps to establish realistic assumptions about the availability, suitability and the likely economic viability of land to meet the identified need for housing. The SHLAA, which is required by the NPPF, forms a key component of the evidence base, which, alongside other documents, will be used to underpin policies and strategies for housing.
- 6.11 In order to ensure full compliance with changes in the NPPF and national Planning Practice Guidance the Council's SHLAA methodology was amended and a consultation on the proposed changes was consulted on. A 'Call for Sites' was undertaken simultaneously with the consultation on the revised methodology and responses have been assessed, and included in the most recent SHLAA. Given the level of unmet housing need, the Council published a 'call for sites' at every stage of Plan progression and, in effect, anyone who wants to promote a site in Worthing can do so at any time.
- 6.12 The SHLAA is reviewed annually (usually with a base date of 1 April each year) and reassesses all existing sites with the addition and assessment of new opportunities. Whilst the Council is confident that all reasonable steps have been taken to ensure potential opportunities have been identified it is nevertheless undergoes a further reassessment which will include:
- SHLAA sites previously assessed as not being suitable for development (Rejected Sites) - A further assessment of SHLAA sites considered not suitable or available for housing and therefore rejected in the SHLAA has been undertaken. This considers the extent to which it would be possible to meet the Objectively Assessed Need (OAN) through discounting one or more of the physical or sustainability constraints used by the SHLAA to test the suitability of sites.
 - Sites assessed as being developable in the SHLAA 2020 Update (Rejected Site – Monitor) - A number of brownfield sites have been identified as being potentially suitable for residential development but are not currently available. These are sites that may be developable but not currently deliverable and have not been included as part of the housing delivery figure. These sites are being reassessed to update their SHLAA status in terms of availability and to identify and consider how potential barriers to delivery can be overcome.
- 6.13 To reflect the most up to date position prior to the Local Plan examination, it is considered prudent to incorporate all changes in circumstances and new opportunities prior to examination to ensure the most up to date situation is reflected this work is

underway and will be reported in the Final Housing Implementation Strategy at submission of the Plan.

ACTION 5 – Land in ‘Other’ Use

- 6.14 The Council has taken positive steps to ensure that there has been a balanced release of sites in other use to residential use. As stated previously planning has to ensure that a balanced approach is taken to ensure that ‘ALL’ development needs of the community are met in the most appropriate and sustainable way. To do this the Council drew upon a number of evidence sources including commissioning consultants to undertake detailed and robust assessments of the current levels of provision and the need for new provision going forward. This included the assessment of current shortfall in provision and new provision required given the level of growth expected. This has included studies such as; the Retail Study, Employment Land Review and Sport, Leisure and Open Space Study. Whilst this evidence provides a strong justification for the protection of most ‘other’ uses it is made clear that in most cases this does not mean there is ‘blanket’ protection. Policies within the Core Strategy and new Local Plan set criteria through which the ‘value’ of existing uses can be assessed and, in turn, this helps to establish the tests which, if met, would justify the loss of a particular use (e.g. employment sites, community facilities and guest houses) to housing.
- 6.15 A particular example of a positive approach taken during the progress of the Local Plan has been the HMRC Offices in Barrington Road. Whilst current policy seeks to protect the site for employment use the evidence suggested that this site could be released for residential in the Submission Draft Local Plan site. The lease was due to expire on this site and in addition a new specialist regional hub had been given approval at Teville Gate (near completion). This provided the Council the opportunity to review the site against the findings of the Employment Land Review and in light of the overwhelming housing need. The balance conclusion was reached that provide an opportunity for at least 250 homes to be built and the provision of specialist housing in the form of a care home / sheltered accommodation.
- 6.16 The Council continues to take a flexible and pragmatic approach to new development proposals. There are a number of policy approaches that can help with the delivery of new homes whilst balancing the wider sustainable, community and economic needs of the borough. In order to deliver sites and respond to changes in the economy the Council can, depending on circumstances, take a flexible approach to the application of its adopted policies.

ACTION 6 - Maximising densities

- 6.17 National Planning Policy is clear that in setting new policies, plans must contain policies to optimise the use of land in their area and meet as much of the identified need for housing as possible. Applications that fail to make the most efficient use of land should be refused.
- 6.18 Land is a scarce resource in Worthing and there are competing demands for its use. Given the need for additional homes it is important that the limited amount of land

available is used efficiently when considering proposals for new residential development. Local Plan Policy DM2 (Density) is considered to achieve the right balance between increasing the number of much needed new homes whilst also ensuring that the intrinsic characteristics of the town that are valued by its residents and visitors are not lost. Whilst the policy will, in general, deliver up uplift in residential densities the right checks and balances are in place within the Plan to ensure density of development is appropriate to its setting. Worthing has undergone significant change over its history and will continue to do so but it needs to be done in a way that ensures the right level of densification is steered to the most appropriate locations taking account of local characteristics, accessibility, environmental considerations and infrastructure provision.

- 6.19 To support the policy position, the Council has committed to updating the current 'Guide to Residential Development' 'Supplementary Planning Document (SPD). This document provides general policy and design guidance for all residential development. It will be reviewed after the adoption of the new Local Plan to ensure that reflects and adds more detail to the new local policies including the proposed DM2 Density policy in the Submission Draft Local Plan. Whilst the focus is on residential density the Council will take all opportunities to make sure that other uses make the most efficient use of land.
- 6.20 The expectation is that residential development of a family housing scheme should achieve minimum densities of 35dph whilst flats, mixed residential developments in or close to town centres or near public transport hubs should be achieving densities far in excess of this. Where developments do not demonstrably optimise the housing density of a site then permission is refused. Unlike some, more rural, authority areas this is not a common issue in Worthing as the nature and character of the borough means that the vast majority of proposals for development seek to maximise development.
- 6.21 Appendix 8 provides more detail on the Council's approach to density and supports the approach set out in policy DM2 (Density) in the Plan.

Space Standards

- 6.22 Whilst higher density housing can help to meet housing needs and regenerate an area it is vital that greater intensification of development still provides a good living environment for both existing and future residents. Therefore, Policy DM2 introduces the Governments national described space standards together existing local standards to apply to external space in new developments. Appendix 9 sets out the justification for this approach.

ACTION 7 - Review of Council owned sites / land

- 6.23 The Council as a landholder has identified a number of its own sites that may be surplus to requirements and is currently considering further sites to bring forward additional homes as part of an asset management review. This allows the Council to prioritise and use resources to unblock any barriers to delivery as well as providing

more delivery certainty. The application of Fulbeck Avenue within the Plan and the recent granting of planning permission is a good example of how the Council as a landowner can be proactive in bringing sites forward. The Council has also been proactive in acquiring sites such as Union Place (Plan Allocation A14) where development has been slow in coming forward, this site has just gone out to market with outline planning permission to attract an investor.

ACTION 8 – Staffing and resources

- 6.24 An experienced cross-discipline Major Projects and Investments team has been set up to allow the Council to be more proactive in identifying issues and barriers to housing delivery on major sites. Part of their remit is to develop close working relationships with land owners/developers of the key sites across the borough together with infrastructure providers and other departments in the Council in order to unlock barriers to delivery. This includes a full review of the Council's own 'estate' and a more proactive land assembly and 'commercial' approach to site delivery if required. They have been successful in leveraging public funding where available and developing business cases to help unlock sites. The Council has also appointed a Development Manager to oversee both the delivery of Council owned sites and to identify any opportunities to acquire land in the private sector which could be developed for new homes.
- 6.25 There are a number of major development sites that are due to come forward over the Plan period. In order to ensure that are dealt with in the most efficient manner the Council has a dedicated Principal Planning Officer (Major Applications) with responsibility to provide detailed pre-application advice, enter into early stage negotiations in respect of S106 Agreements/CIL and liaise with other Council departments and other stakeholders. The aim is to ensure that the application process through to decision making is as smooth as possible by providing continuity and greater certainty for all parties involved. The Council has also procured a software package to help manage and support S106 & CIL processes – this will help applicants as their proposals progress.
- 6.26 The Council makes great effort to ensure that resources and project management arrangements are in place to process planning applications in an efficient and timely manner. This, along with the provision of effective Pre-Application advice ensures that applications are determined expeditiously. The performance of Development Management (% of applications determined within prescribed timescales and the outcome of appeal decisions) is reported within the Council's Annual Monitoring Report.

ACTION 9 - Supporting Investment in Worthing

- 6.27 Worthing Borough Council, with the support of West Sussex County Council and other partners, has developed a vision for how the town will continue to be transformed in the future. The Council and other local partners are offering a 'ready to deliver' commitment. In practice, this means investors in Worthing can expect, direct contact with Council leaders and senior officers, a dedicated Economy Directorate with an

experienced cross-disciplinary team. Where appropriate, the Council will be willing to consider flexible approaches to planning, development and tenure mix and a willingness to use public sector land assets directly and indirectly. Furthermore, the Council will provide a 'commercial' approach, encourage proactive land assembly and lever public funding where available for developing business cases.

ACTION 10 - Corporate Marketing

- 6.28 The Council has sought to raise the profile of the borough and the key development opportunities it offers. Initiatives include the publication of an Investment Prospectus (<https://www.adur-worthing.gov.uk/worthing-investment-prospectus/>) In addition, the Council publishes a regular magazine '[Building Adur and Worthing](#)' which keeps residents, businesses and prospective investors up-to-date with all the latest developments.

ACTION 11 - Supplementary Planning Documents

- 6.29 There are a number of Supplementary Planning Documents (SPD) relevant to the delivery of housing. These help to provide additional guidance to interested parties and potential applicants – which in turn should help to ensure sites are delivered expediently in line with the Council's development strategy:

- Tall Buildings Guidance SPD
- Guide to Residential Development SPD
- Space Standards SPD
- Sustainable Economy SPD
- Developer Contributions SPD

- 6.30 Where appropriate, following the adoption of the Local Plan, existing SPDs will be updated to reflect the most up to date policy position and to give clear guidance to developers and applicants. An indicative timeline for this review is set out in the Council's [Local Development Scheme](#) (Jan 2021).

- 6.31 Where necessary the Council may produce development briefs / planning briefs / planning statements and Action Plans to increase delivery certainty of sites progressing through the planning process. This will help to address site delivery blockages.

ACTION 12- Affordable housing

- 6.32 The Council has set up a cross service group to address the significant shortfall of affordable housing provision across the borough. The primary focus of the affordable homes delivery group is to identify opportunities for the delivery of affordable homes through more efficient use of Council owned land, together with the acquisition of land and premises for redevelopment.

ACTION 13 – Build out Rates

- 6.33 A number of the major/strategic sites, which are critical to the delivery of the housing strategy, are controlled by the volume/national housebuilders who are also developing large sites in neighbouring local authorities. This could be a significant factor in slowing delivery rates as volume housebuilders are known to limit the release / commencement of development sites in order to maintain strong demand within the housing market area. The Council continues to work closely with these key developers/landowners and others to ensure the housing trajectory reflects the most realistic delivery timescales.

ACTION 14 - Relationship with developers, landowners and agents

- 6.34 The Council recognises the fundamental importance of positive building relationships with developers, landowners and agents. Contact with these partners is an essential part of assessing whether sites are available for development as part of the Strategic Housing Land Availability Assessment. Furthermore, an understanding of the local development market helps the Council to review, and where appropriate amend, policies, development requirements and guidance to ensure schemes remain viable whilst also meeting identified housing and community needs.

ACTION 15 – Self Build and Custom Build

- 6.35 The NPPF expects the delivery of a wide choice of high quality homes, a widening of the opportunities for home ownership and creation of sustainable, inclusive and mixed communities. The size, type and tenure of housing needed for different groups in the community needs to be assessed and reflected in planning policies and this includes people wishing to commission or build their own homes.
- 6.36 The Self-build and Custom Housebuilding Act 2015 and the Housing and Planning Act 2016 place a duty on local planning authorities to keep a register of individuals and associations of individuals who are seeking to acquire serviced plots of land for self-build and custom housebuilding in their area to build their own home. Since 1st April 2016 the Council has maintained a register for people wishing to build their own homes in accordance with its statutory duty under the Self Build and Custom Housebuilding Act 2015. In October 2019, following a public consultation, Adur and Worthing Councils introduced a local connections test. The joint Adur & Worthing Councils Register is available on the Council's website for both individuals and associations of individuals to provide relevant information on their plot requirements to the local authority.
- 6.37 There is also a requirement for the Council to have regard to the register when carrying out its planning, housing, regeneration and disposal of land functions. The Act also requires local authorities to grant sufficient planning permissions for serviced plots of land to meet the demand for self-build and custom housebuilding in their area. Those who meet all of the eligibility criteria will be entered on Part 1. Those who meet all of the eligibility criteria except for the local connections test are entered on Part 2. It is only those on Part 1 of the Register that count towards the number of suitable serviced plots that planning permission should be granted for.

- 6.38 The Council's Delta return for Self-Build and Custom Build Housing (2019/20) indicates that for the period up to 30 October 2020 there were a total of 44 entries for both authorities. Of these 24 plots related just to Worthing with 20 entries falling under Part 1 of the register and 4 falling under part 2. All of the entries are by individuals and no groups are registered.
- 6.39 CIL self-build exemption is one way of measuring units that have been self-build. In this regard, during the monitoring period 31 October 2019 to 30 October 2020 there was one application that was granted CIL self-build exemption and that was for one unit. It is also of note that there have only been 8 applications granted Self Build Relief since the introduction of CIL in October 2015.
- 6.40 The Council's Strategic Housing Land Availability Assessment assesses the potential of sites to deliver housing development. However, this assessment only considers sites that could have the potential to deliver 5 or more dwellings. The Council does not collate or promote a list of sites specifically for self-build projects. However, the majority of people currently on the self-build register are requesting a single plot. A significant proportion of the housing delivered in Worthing is on smaller sites, which would be suitable for people wishing to build their own home. The Council makes available on its website, information on sites both where an application has been made for residential development and where consent has been granted. There is therefore no reason why someone interested in self-build couldn't pursue an application on a small plot.
- 6.41 With regards to larger sites, the Council has regularly asked landowners and developers to consider the including part of their site for self-build and custom build. These requests have not been viewed positively and the key reason for this is the complexity this adds in terms of design codes, infrastructure provision, the timing of delivery and viability certainty.
- 6.42 Whilst it is difficult to plan for the delivery of self-build housing the Submission Draft Worthing Local Plan acknowledges the Government's strategy to improve diversity in housing provision and the part self-build and custom build can play in delivering this objective. The Plan is supportive of suitable proposals and policy DM1 (Housing Mix) specifically commits the Council to support proposals for high quality self-build and custom build projects that are sensitive to the characteristics of the local area. In addition, the Council will continue to explore any opportunities that may arise to help meet this need.

PART 7 – RISKS AND CONTINGENCIES

Overall Risks to Delivery

- 7.1 Throughout the production of this Local Plan there has been ongoing engagement with key stakeholders and local communities. The process of this engagement is set out in the Adur and Worthing Joint Statement of Community Involvement 2019. However, more recently and response to Covid-19 an Interim Addendum (2021) has been published to outline temporary changes to consultation procedures / practices in light of national restrictions.
- 7.2 A consultation database specifically for the Local Plan has been maintained and used to engage with all parties with an interest throughout the whole Local Plan production process. A Statement of Consultation accompanied the Regulation 18 Draft Worthing Local Plan 2018 document and sets out details of the engagement undertaken and how it has been used to inform the Local Plan policies. The Council has prepared a Statement of Consultation to fulfil the requirement of Regulation 22.
- 7.3 Overall, risks to delivery are considered low. A raft of background evidence, together with continuous engagement, the encouragement for pre-application discussions with developers and landowners gives the Council confidence that the Submission Draft Local Plan strategy is able to deliver sufficient housing to meet the target of a minimum of 230 dwellings per annum in the Local Plan to 2036 and ensure a continuous supply of housing throughout the Plan period. This target is based on a maximum supply provision position and as such it does not build in any significant degree of headroom. However, given the very significant levels of housing need in the Borough the Council has taken the view that this is the appropriate positive approach and (as explained below) that suitable measures to manage this are in place and that these will provide some flexibility / contingency.
- 7.4 However, it is necessary to identify potential risks to delivery should sites and housing delivery not come forward at the rate envisaged. This will increase the robustness of this Housing Implementation Strategy and also to ensure that, where possible, potential mitigation measures are identified to address these risks.
- 7.5 The main identified risk to overall housing delivery is the health of the economy, which will be a major factor in the supply of housing throughout the Local Plan period. The ability of developers to access finance and the availability of mortgage products to prospective purchasers have also had an impact. The uncertainty surrounding the economic impact of the current Covid - 19 pandemic and the effects of Brexit on the housebuilding industry are as yet unknown, but indications suggest that there is likely to be another economic downturn, this will have a detrimental effect on delivery rates, over which the Council will have little control. There is a risk therefore that the Local Plan housing target will not be delivered in the timeframe suggested.
- 7.6 However, the Council is confident that the comprehensive evidence base indicates that sufficient housing will be delivered from the sources identified. The Council has sought

to minimise the risk of unforeseen issues by undertaking detailed assessments of potential constraints during the Plan preparation process. This has included commissioning a number of background evidence studies and continuous liaison with key statutory agencies and site promoters throughout the local plan process.

- 7.7 The risk of additional infrastructure requirements, particularly in respect of the allocations, has been minimised through working closely with key infrastructure and service providers throughout the Plan preparation process. Overall, the work undertaken by the Council provides strong delivery certainty that sites will come forward as forecast. Whilst the risk of non-delivery of sites (or delayed delivery) is low unforeseen barriers to development may occur. The Council will work with developers and service providers to help overcome this. Every effort will be made to ensure the appropriate levels of support and (where appropriate) interventions are provided to keep the delivery 'on track'. Whilst the trajectory is realistic at this point of time there may of course need to be a re-evaluation of delivery timelines (both forwards and backwards) as the Plan progresses. Given the nature of the development market the the precise timeline needs to be somewhat fluid – however, the Council has great confidence that all sites allocated and planned for will be delivered within the Plan period.
- 7.8 Working with the relevant infrastructure/service providers and site promoters, an Infrastructure Delivery Plan has been prepared alongside this Local Plan. This sets out what infrastructure is required to support specific developments and the costs and sources of funding proposed to deliver this infrastructure. Infrastructure delivery to support development will be part funded by the Community Infrastructure Levy (CIL). CIL has been in place in the borough since 2015 and an Infrastructure Investment Plan was published in 2020 to establish a 3-year spending programme for the money collected. The existing CIL Charging Schedule has recently been through examination and the Inspector has found the Revised Charging Schedule to be Sound. Importantly, the review (and the associated Whole Plan Viability Assessment) helps to ensure that the infrastructure requirements and contributions placed on development are not impacting on development finances to such a degree as it might make schemes unviable.
- 7.9 The level of development proposed to be delivered in the Local Plan (230 dpa) is 15% higher than the levels of growth planned for within the Worthing Core Strategy (200 dpa). Whilst this is a significant increase it is not so great that it will impact on proposed build out rates and market demand.
- 7.10 Viability of individual sites is a key risk. There is a theoretical risk that the policies and requirements in this Plan will have an adverse impact on the viability of development, thus inhibiting completion rates. A Whole Plan Viability Assessment has been undertaken which has tested a wide range of theoretical scenarios and most of the proposed allocations. The findings of the assessment indicate that the policies of the Plan, taken together, do not adversely impact the viability of development. Details of the Whole Plan Viability can be found on the Council's website.

Contingencies

- 7.11 The Local Plan includes a Monitoring and Delivery Framework which will assess the overall impact of the strategy and whether or not the vision and strategic objectives are being delivered. Housing delivery will continue to be measured as part of this.
- 7.12 The Council has been unable to identify contingency sites and build in flexibility to help address the shortfall in meeting its objectively assessed need for housing. Put simply every available, viable and sustainable development site in and around the borough HAS been allocated in the Plan. The lack of land available and the sensitive character of Worthing, means that there simply are no reasonable and sustainable alternatives for development.
- 7.13 Therefore, every effort will be made to facilitate and support the strategy for delivery set out in the Local Plan. In addition to the housing identified, there is likely to be scope for additional housing, as yet unidentified, from other sources over the Plan period:
- Additional housing opportunities from future “windfall “large sites of 5+ homes which are not currently identified in the SHLAA.
 - Sites identified in the SHLAA that are suitable for development but are not currently available.
 - Additional housing from current planning applications which were either granted consent after 1 April 2020 or are yet to be determined.
 - Currently unidentified sites that will come forward as a result of new Permitted Development Rights and the greater flexibilities to provide new housing.
 - The continued positive review of Council landholding and assets. Consideration will be given to the redevelopment for housing of any Council owned land identified through this review.
 - The potential delivery of housing on land currently occupied by Worthing United Football club - subject to suitable relocation (see Allocation A1).
 - Undertake regular review of sites currently allocated for mixed uses to establish whether the proposed uses continues to best reflect prevailing needs and in doing so consider whether a greater proportion of residential use could be delivered.
 - The potential of some site allocations to bring forward a slightly higher level of development than that assumed in the Local Plan (subject to design, massing, and environmental considerations being taken into account as the scheme is progressed).

- 7.14 The Local Plan does not rely on contributions from these additional sources to help meet the housing target as there is uncertainty about how much and when any new homes may be delivered. It does however provide a degree of flexibility in the event of any shortfall arising in identified sites over the Plan period.
- 7.15 As explained in Part 6 above, at the Draft Local Plan Stage three Omission Sites were included for comment. Since that time, work has demonstrated that some of the development constraints could be overcome / mitigated. As a result, two of the sites are now allocated. The third, Worthing United Football Club, does not form part of the Submission Draft Local Plan as no suitable site could be found for the successful relocation of the club. Whilst this is not a formal 'reserve site' it could potentially help to deliver some additional housing at such time that the Council could support a relocation.
- 7.16 The Council has identified potential measures to encourage the delivery of sites:
- Developers/landowners will be contacted to identify and understand reasons for delay or non-delivery of sites and find ways to help.
 - Developers/landowners will be encouraged to hold pre-application discussions.
 - A flexible policy approach will be taken where it can be demonstrated that viability is an issue.
 - Alternative/additional funding streams e.g. Local Growth Fund, to help with bids as appropriate.
 - Where necessary the Council may produce development briefs/planning briefs/planning statements to increase certainty of sites progressing through the planning process.
- 7.17 Furthermore, the Council has established a major projects and investment team to help support the delivery of key regeneration sites, many of which are also supported within the sub-regional strategies and funding programmes. Where appropriate, key sites will be brought under Council ownership in order to increase the certainty of delivery.

PART 8 – MONITORING AND REVIEW

- 8.1 The Council comprehensively monitors housing delivery. The monitoring of planning permissions on all sites involving residential dwellings is undertaken by West Sussex County Council on behalf of the West Sussex Authorities on an annual basis. This has been undertaken since the late 1990s and thus good historical evidence of delivery exists. All sites of 5 or more dwellings are visited and together with information from a variety of other sources, the progress of each site is tracked. This information is checked by the respective local authority and additional information on site specific delivery rates and phasing is provided. Any lapsed permissions are removed from the database. Together this provides robust information on housing commitments, completions and other identified sites.
- 8.2 This information is included in the Council's Annual Monitoring Report (AMR) which will be the main document for monitoring housing delivery. The AMR also shows the 5 year housing land supply position against the housing target set in the Local Plan. The housing trajectory will be updated annually and provides for projected housing supply over the plan period.
- 8.3 The Strategic Housing Land Availability Assessment (SHLAA) will be monitored on an annual basis to ensure that the most up to date site information is incorporated and reflected in an updated housing trajectory. This will be reported through the AMR.
- 8.4 If monitoring of the five year housing land supply indicates that Local Plan targets are not being met in the short term or that strategic sites are not being delivered in the longer term, the Council will seek to address the issues within the framework of this Plan. The Council will continue to work with landowners, developers, and other relevant bodies to identify and resolve obstacles to delivery.
- 8.5 If however, the issues surrounding delivery are unable to be resolved then the Council may need to review the Local Plan. This may be the case if:
- new evidence indicates that an unforeseen issue prevents development of a strategic allocation/broad location.
 - new evidence results in a significant reduction in the amount of housing able to be delivered on a strategic allocation/broad location and the shortfall is unable to be addressed elsewhere in the Plan.
- 8.6 Under delivery in any one particular year may not require immediate intervention but prolonged under delivery may have implications for the 5 year supply.
- 8.7 The Annual Monitoring Report will be published in December each year and made available on the Council's website (it will cover the proceeding financial year).

Meeting shortfall outside the Borough

- 8.8 The fact that not all of Worthing's identified development needs will be met within the borough places great importance on Duty to Co-operate considerations. For this reason, the Council has been working with other local authorities across the sub-region to address key strategic matters. Whilst positive progress has been made, it is evident that currently only a very small proportion of the borough's shortfall might be met elsewhere in the sub-region.
- 8.9 A Statement of Common Ground (SOCG) has been signed by all the authorities represented within the Sussex Coast Housing Market Area (as well as the West Sussex authorities of Crawley, Horsham and Mid Sussex). This commits the authorities to continue to engage constructively, actively and on an ongoing basis with other local authorities and organisations to address sub-regional issues and to work together to explore longer-term solutions for housing delivery. More information can be found in the Duty to Co-operate Statement which accompanies the Local Plan.

PART 9 – CONCLUSION

- 9.1 Using the national Standard Method, Worthing has an overall objectively assessed housing need of 885dpa. Over the Plan period this equates to a total need of 14.160 net new dwellings.
- 9.2 The Submission draft Local Plan seeks to meet the specific housing needs of the borough as far as sustainable and practical within a land constrained borough, taking viability into account. Despite taking a very positive approach to development the Local Plan will only deliver approximately 26% of its overall housing needs.
- 9.3 Evidence also identifies a substantial need for additional affordable housing with a total need for 490 dwellings per annum in Worthing.
- 9.4 Within the context of key constraints faced by the borough, the most significant of which is land availability, the Council acknowledges the significant level of shortfall against the Standard Methodology target. As such, no stone has been left unturned and the Council has looked robustly and positively at all sources of potential supply. The Council is seeking to maximise the supply of land within the borough for new housing opportunities, including increasing densities across the borough and particularly in locations where these are served by accessible public transport and other facilities. A number of other initiatives are being pursued by the Council to support the delivery of housing as set out in this paper (see Part 6).
- 9.5 Most planning authorities issue a 'Call for Sites' within set time periods. However, given the level of unmet housing need and the lack of opportunity sites, Worthing Borough Council keeps its 'Call for Sites' open at all times. It is hoped that this would encourage potential sites to be put forward for consideration. Whilst this approach has generated a few 'new' sites this has been very limited as the reality is that the vast majority (if not all) potential sites are known to the Council and have been 'tested' and or allocated for development.
- 9.6 The Council is confident that evidence supports the housing delivery target, set out in Policy SS3 of the Submission Draft Worthing Local Plan. This is the most realistic and deliverable 'Policy-On' figure given the identified constraints.
- 9.7 This Housing Implementation Strategy demonstrates that the local planning authority does have a five-year housing land supply and that there is a sufficient supply of land for the delivery of the proposed housing target as shown in the housing trajectory.
- 9.8 The Local Plan site allocations are essential to the delivery of the overall strategy. However, the delivery of small and unidentified sites will continue to make a significant contribution to the housing supply.
- 9.9 Extensive and continuous stakeholder engagement has taken place throughout the process of developing policies in the Submission Draft Local Plan. The risks to the delivery of the components of the draft housing delivery strategy, together with the

mitigation required have been identified and the overall risk to the housing delivery strategy is low. The Council have acknowledged that the Local Plan target is based on maximising supply with little or no headroom. However, it is considered that this is a suitable approach for the borough with the appropriate risk mitigation and contingency measures as set out in Part 7 of this report.

9.10 The Local Plan Route Mapper has been prepared by the Planning Advisory Service to assist Councils as they progress Local Plans. It provides advice on project planning and management which has helped in scoping and developing an approach to the Council's policies update which is appropriate and proportionate to Worthing. This work also provides a detailed assessment of conformity and soundness in line with the requirements of the NPPF:

- Route Mapper Part 1 - Local Plan Review Assessment (not completed as a Local Plan review had commenced prior to the publication of this toolkit)
- [!\[\]\(9063468a59e93f469b71000ac5796bc3_img.jpg\) Route Mapper Part 2 - Local Plan Form and Content Checklist \(May 2021\) \(1,793KB\)](#)
- [!\[\]\(1db6320223680ab4bd04b0d269ab6c8a_img.jpg\) Route Mapper Part 3 - Local Plan Process Requirements Checklist \(May 2021\) \(1,658KB\)](#)
- [!\[\]\(cd69309a3e813d8c682e56d54a0f4a01_img.jpg\) Route Mapper Part 4 - Local Plan Soundness and Quality Assessment \(May 2021\) \(2,316KB\)](#)

9.11 Overall, the Council considers that the Submission Draft Local Plan is 'sound' and complies with the legal requirements, including the duty to cooperate. It is considered that following tests of soundness have been met:

- Positively prepared – providing a strategy which, as a minimum seeks to meet the area's objectively assessed needs whilst also being consistent with achieving sustainable development;
- Justified – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;
- Effective – deliverable over the plan period and based on effective joint working on cross-boundary strategic matters; and
- Consistent with national policy – enabling the delivery of sustainable development in accordance with the policies in the National Planning Policy Framework.

APPENDICES

Appendix 1 - Standard Methodology Calculation

Appendix 2 - Strategic Housing Land Availability Assessment
Review sites at 1st April 2020

Appendix 3 - Sites with Extant Planning Permission (5+ units)
considered deliverable as at 1 April 2020

Appendix 4 - Worthing Windfall Calculations 2006 – 2020

Appendix 5 - Submission Draft Local Plan Allocations

Appendix 6 - Housing Trajectory for Submission Draft Local Plan

Appendix 7 - Five Year Housing Land Supply

Appendix 8 - Density

Appendix 9 - Space Standards

Appendix 1 Standard Methodology Calculation

The Government has advised that the 2014 based figures (published 2016) and not the latest 2016 based figures (published 2018) should now be used for calculating the Standard Methodology. The 2014-based household projections are used within the standard method to provide stability for planning authorities and communities, ensure that historic under-delivery and declining affordability are reflected, and to be consistent with the Government's objective of significantly boosting the supply of homes.

Data

Household growth projections (2014 figures) (Table 406):

<https://www.gov.uk/government/statistical-data-sets/live-tables-on-household-projections>

2020 = 51,981 2030 = 58,304

Projected growth over 10 years is $58,304 - 51,981 = 6,323$

Projected annual household growth rate = $6323/10 = 632.3$ (rounded **632**)

Affordability Ratio

Average annual projected household growth figure (as calculated in step 1) now needs to be adjusted based on the affordability of the area.

The Local Affordability Ratio (based on 2019 data published in March 2020) is 10.89

<https://www.ons.gov.uk/peoplepopulationandcommunity/housing/datasets/ratioofhousepricetoworkplacebasedearningslowerquartileandmedian> (Table 5c)

Adjustment Factor

Adjustment Factor = $\frac{(\text{Local Affordability Ratio} - 4)}{4} \times 0.25$

$\frac{(10.89 - 4)}{4} \times 0.25 = \frac{6.89 \times 0.25}{4} = 0.430625$ (rounded 0.431)

Minimum annual Local Housing Need (LHN) figure = $(1 + \text{adjustment factor}) \times \text{annual projected household growth}$

$(1 + 0.431) \times 632 = 1.431 \times 632 = 904.392$ (904 rounded)

Minimum annual local housing need figure = **904 pa**

Applying a Cap

A cap is then applied which limits the increases an individual local authority can face. How this is calculated depends on the current status of relevant strategic policies for housing.

Worthing CS was adopted more than 5 years ago (at point of making the calculation) the figure is capped at 40% above whichever is the higher of:

1. projected household growth for area over the 10 year period identified in Step 1 or:
2. the AARF (average annual housing requirement figure) set out in the most recently adopted strategic policies (if a figure exists).

In the case of Worthing 1) is applicable.

- Average annual housing requirement in the existing relevant policy is **200 pa**
- Average annual household growth over 10 years (step1) is **632 pa**
- Minimum annual local housing need figure (step 2) is **904 pa**

The cap is set at 40% above the higher of the most recent average annual housing requirement figure or household growth:

Average annual household growth over 10 years = 632

Cap set at 40% above average annual household growth over 10 years

$$632 + (40\% \times 632) = 632 + 252.8 = 884.8 \text{ (885 rounded)}$$

The minimum figure for Worthing is **885 pa**

Appendix 2 - Strategic Housing Land Availability Assessment Review sites at 1st April 2020

Ref	Site	Site Total (Gross)	0-5 yrs	6-10 yrs	11-15 yrs	Losses	Site Total (net)	Comments
SHLAA sites that are Proposed Local Plan Allocations 2020								
WB08176	Beeches Avenue (A1)	90	0	90	0	0	90	New Allocation for Emerging Local Plan
WB08138	Caravan Club (A2)	100	0	100	0	0	100	Council owned site and proposed allocation in the Emerging Local Plan.
WB16006	Centenary House (A3)	250	0	250	0	0	250	WSCC owned site and proposed allocation in the Emerging Local Plan.
WB08183	Fulbeck Avenue (A6)	120	120	0	0	0	120	Council owned site and proposed allocation in the Emerging Local Plan.
WB08180	Grafton Site (A7)	150	150	0	0	0	150	Council owned site, existing AOC (See Section 5 AOC 3) and proposed allocation in the Emerging Local Plan.
WB08048	Lyndhurst Road (A9)	150	0	150	0	0	150	Existing CS AOC (See Section 5 AOC 7) and New Allocation for Emerging Local Plan
WB08046	Stagecoach Site (A11)	60	0	60	0	0	60	Existing CS AOC (See Section 5 AOC 2) and proposed allocation in the Emerging Local Plan.
WB08039	Teville Gate (A12)	250	250	0	0	0	250	Existing CS AOC (See Section 5 AOC 5) and proposed allocation in the Emerging Local Plan.
WB18011	Titnore Lane (A13)	60	0	60	0	0	60	New Allocation for Emerging Local Plan
WB08042	Union Place (A14)	150	150	0	0	0	150	Existing CS AOC (See Section 5 AOC 4) and proposed allocation in the Emerging Local Plan.
WB08163	Upper Brighton Road (A15)	123	123	0	0	0	123	New Allocation for Emerging Local Plan.
Total Proposed Allocations (excluding HMRC as this is included within Commitments in Table 4 above)		1,503	793	710	0	0	1,503	

Other SHLAA Sites Excluding Proposed Local Plan Allocations 2020								
WB08168	22 Lyndhurst road	24	24	0	0	0	24	An application has been refused and an appeal dismissed. Residential is acceptable on this site.
WB18002	Wheatsheaf, 24 Richmond Road	6	6	0	0	0	6	Planning application refused but suitable for 6 units subject to design.
WB18008	Jubilee Hall & 10 Greenland Road	14	14	0	0	0	14	Planning permission approved but legal agreement pending.
WB17002	Southdown Pub, 38 Northcourt Road	7	7	0	0	0	7	Planning application (AWDM/0162/19) approved (01/05/20) but outside this assessments monitoring period.
WB08198	42-46 Teville Road	9	9	0	0	0	9	Planning application (AWDM/0240/20) has been approved (05/05/20) but outside the monitoring period.
WB20001	Jupps Garage	5	5	0	0	0	5	Planning application submitted and approved (17/07/20) outside the monitoring period.
WB20002	19 Reigate Road	6	6	0	0	0	6	Planning application (AWDM/1827/19) approved (30/04/20) outside the monitoring period.
WB20008	NHS The Causeway	48	48	0	0	0	48	Planning application (NOTICE/0007/20) approved (03/06/20) outside monitoring period.
WB20009	Former Canteen, Northbrook College	20	20	0	0	0	20	Planning application (AWDM/0632/20) refused outside monitoring period but the site is considered suitable for residential use.
Totals for Other SHLAA Sites Excluding Proposed Local Plan Allocations 2020		139	139	0	0	0	139	
	Total	1,642	932	710	0	0	1,642	

Appendix 3 - Sites with Extant Planning Permission (5+ units) considered deliverable as at 1 April 2020

Planning Ref	SHLAA Ref	Address	Site Total (Gross)/ Remaining To be delivered	Time Frame (Years)			Losses	Site Total (net) (remaining to be delivered)	Achievability
				0-5*	6-10*	11-15*			
		<u>Goring Ward</u>							
NOTICE/0020/19		HMRC, Barrington Road	254	254	0	0	0	254	Notice application approved. Site is also identified as an Allocation in the Emerging local Plan (for 250 dwellings)
		<u>Marine Ward</u>							
AWDM/1713/16		Land South Of 6 Grand Avenue	29	29	0	0	5	24	Planning permission granted.
		<u>Central Ward</u>							
WB/0447/09	WB13041	37-39 Chesswood Road	9	9	0	0	2	7	Under construction.
		7 Oxford Road	5	5	0	0	1	4	Planning permission granted.
AWDM/1801/18		Scouts Hall, Anglesea St	6	6	0	0	0	6	Planning permission granted.
AWDM/1633/16		The Aquarena Brighton Road	141	141	0	0	0	141	Under construction
AWDM/0941/16		40 - 42 South Street	8	8	0	0	0	8	Planning permission granted.
		18 Warwick Street	2	2	0	0	0	2	Planning permission granted.
AWDM/0063/17		7 The Steyne	10	10	0	0	1	9	Planning permission granted.
AWDM/1074/18		12 Shelley Road	6	6	0	0	0	6	Under construction.
AWDM/1529/18		19-23 South Street	45	45	0	0	0	45	Planning permission granted.
AWDM/1202/18 + and AWDM/1023/19		32-36 South Street	10	10	0	0	0	10	Planning permission granted.

NOTICE/0001/20		First Floor 1-2 Liverpool Buildings Liverpool Road	2	2	0	0	0	2	Notice application approved.
AWDM/1763/18		105 - 109 Montague Street	26	26	0	0	0	26	Planning permission granted.
		Broadwater Ward							
Notice/0001/19		EDF Southdownview Road	78 (30)	30	0	0	0	30	Under construction.
		Durrington Ward							
Notice/0018/16	WB08111	Columbia House Columbia Drive	104	104	0	0	0	102	Prior Notification Approved
AWDM/1480/18		Columbia House Columbia Drive	46	46	0	0	0	46	Planning permission granted.
AWDM/0271/18		Durrington New Life Church 113 Salvington Road	7	7	0	0	0	7	Planning permission granted.
AWDM/1882/16		Land South And East And West Of The Coach And Horses Arundel Road	240	222	18	0	0	240	Planning permission granted.
WB/0275/11	WB08037	West Durrington Strategic (CS1)	700 (23)	23	0	0	0	23	Under Construction
		Heene Ward							
AWDM/0769/15	WB16005	49-56 New Broadway	5	5	0	0	0	5	Under Construction
AWDM/0764/17		The Kingsway Hotel 117-119 Marine Parade	16	16	0	0	0	16	Under Construction
AWDM/1021/19		Downview, Downview Road	8	8	0	0	0	8	Under Construction
AWDM/0848/19		151 Rowlands Road	19	19	0	0	0	19	Planning permission granted.
		Offington Ward							
AWDM/1042/18		59 Warren Road	5	5	0	0	1	4	Under construction.
AWDM/0294/18		7-11 Ardsheal Road	5	5	0	0	0	5	Under construction.
AWDM/1607/19		89 Warren Road	5	5	0	0	1	4	Planning permission granted.
		Salvington Ward							
AWDM/1566/13		The drive, Mill lane	5 (4)	4	0	0	1	3	Under Construction
		Total	1070	1052	18	0	12	1058	

Appendix 4 - Worthing Windfall Calculations 2006 – 2020

Monitoring Year	Windfall /All Completions	Net Total
2006/2007	Windfall total	119
	All completions Total	266
2007/2008	Windfall total	45
	All completions	260
2008/2009	Windfall total	161
	All completions Total	380
2009/2010	Windfall total	102
	All completions Total	252
2010/2011	Windfall total	87
	All completions Total	241
2011/2012	Windfall total	19
	All completions Total	143
2012/2013	Windfall total	30
	All completions Total	172
2013/2014	Windfall total	51
	All completions Total	245
2014/2015	Windfall total	43
	All completions Total	351
2015/2016	Windfall total	81
	All completions Total	484
2016/2017	Windfall total	60
	All completions Total	347
2017/2018	Windfall total	68
	All completions Total	482
2018/2019	Windfall total	45
	All completions Total	293
2019/2020	Windfall total	22
	All completions Total	396
Average over this period (from base date of Core Strategy 2006) = 67 dwpa		

Appendix 5 - Submission Draft Local Plan Allocations

Site	SWLP Capacity	Expected Delivery
A1 Beeches	90	6+ years
A2 Caravan Club	100	6+ years
A3 Centenary	250	6+ years
A6 Fulbeck Avenue	120	0-5 years
A7 Grafton	150	0-5 years
A8 HMRC Barrington*	250	0-5 years
A9 Lyndhurst Road	150	6+ years
A11 Stagecoach	60	6+ years
A12 Teville Gate	250	0-5 years
A13 Titnore	60	6+ years
A14 Union Place	150	0-5 years
A15 Upper Brighton Road	123	0-5 years
Total (including HMRC*)	1,753	Total 0-5 years = 1043 Total 6+ years = 710

*HMRC has planning permission for but is included within the allocations and not commitments to avoid double counting.

Appendix 6 – Housing Trajectory for Submission Draft Local Plan

Worthing Trajectory Draft Worthing Local Plan Target 230 dw pa 2020 - 2036

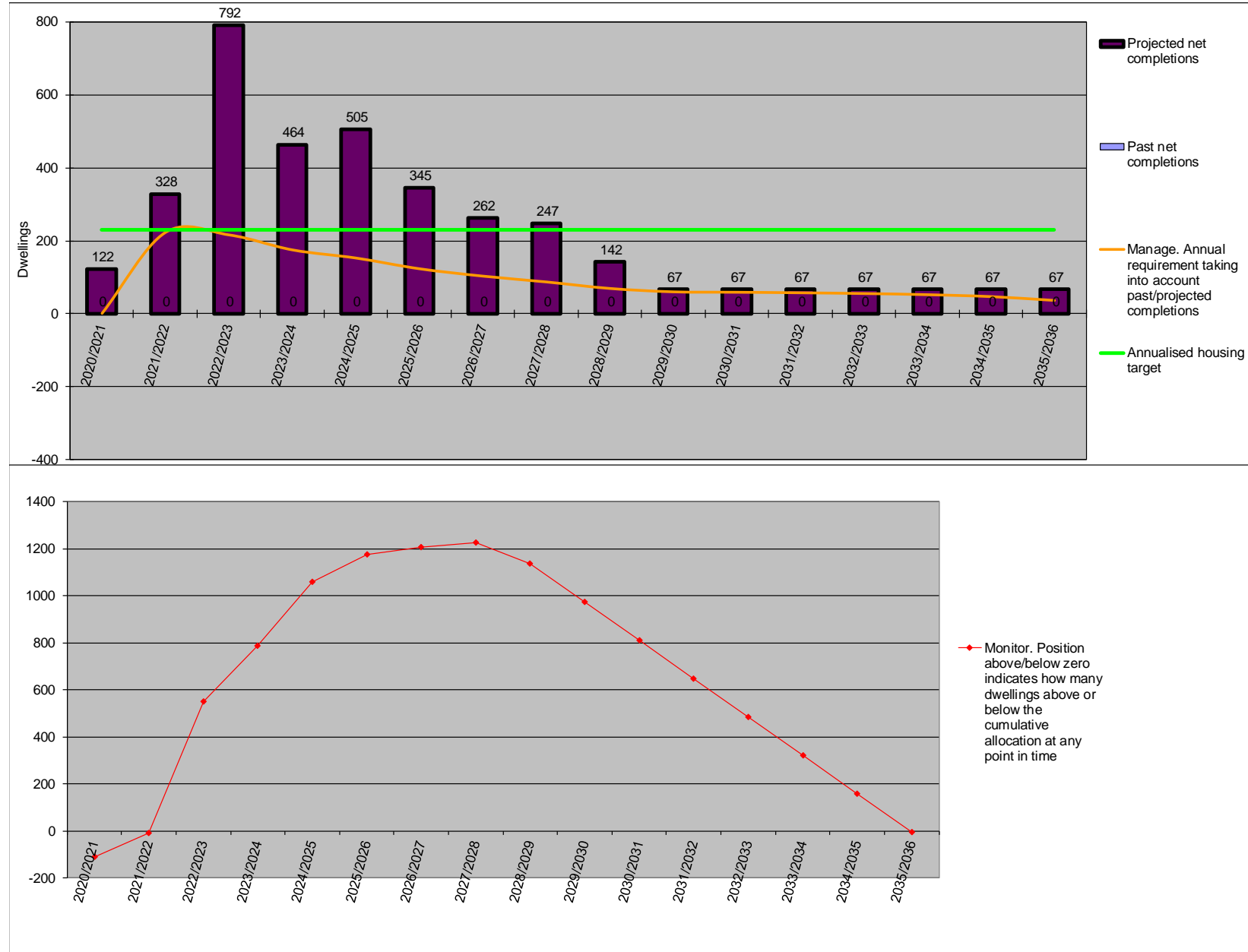
	Projected Completions																Totals
	2020/2021	2021/2022	2022/2023	2023/2024	2024/2025	2025/2026	2026/2027	2027/2028	2028/2029	2029/2030	2030/2031	2031/2032	2032/2033	2033/2034	2034/2035	2035/2036	
Gross Completions at 1 April 2020 (large and small sites)	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	
Commitments at 1 April 2020 (large and small sites with planning permission)(net)	123	243	409	78	50	18	0	0	0	0	0	0	0	0	0	0	921
Allowance for small windfall sites	0	0	0	67	67	67	67	67	67	67	67	67	67	67	67	67	871
Other SHLAA sites(excludes proposed allocations) at 1st April 2020	0	15	74	26	24	0	0	0	0	0	0	0	0	0	0	0	139
Proposed Local Plan Allocations	0	20	320	293	410	260	195	180	75	0	0	0	0	0	0	0	1753
Total Projected Completions/Commitments	123	278	803	464	551	345	262	247	142	67	67	67	67	67	67	67	3684
Losses	1	0	11	0	0	0	0	0	0	0	0	0	0	0	0	0	12
Past net completions	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Projected net completions	122	328	792	464	505	345	262	247	142	67	67	67	67	67	67	67	3672
Cumulative net completions	122	450	1242	1706	2211	2556	2818	3065	3207	3274	3341	3408	3475	3542	3609	3676	
Annualised housing target	230	230	230	230	230	230	230	230	230	230	230	230	230	230	230	230	3680
Monitor. Position above/below zero indicates how many dwellings above or below the cumulative allocation at any point in time	-108	-10	552	786	1061	1176	1208	1225	1137	974	811	648	485	322	159	-4	
Manage. Annual requirement taking into account past/projected completions	0	222	215	174	152	122	102	86	68	59	58	57	54	51	46	36	

Notes

Source: Residential Land Availability Survey, WSCC. To view source data search West Sussex County Council Planning Data for Housing and Residential Land in West Sussex.

Large Sites: 5 units or more. **Small sites:** under 5 units.

Housing Trajectory for Worthing



Appendix 7 – Five Year Housing Land Supply

Five year Housing Land Supply measured against 230 dwellings per annum (Submission Draft Worthing Local Plan (with 20% buffer)).

	Submission Draft Worthing Local Plan	Dwellings (net)	Annual Average
a	Submission Draft Worthing Local Plan target 2020-2036	3672	230
b	Completed	0	
c	Number of years in plan period = 16		
d	Requirement 2020-2036 (a (3672) minus b (0))	3672	230
e	Five year target with no adjustment (230 x 5)	1150	
f	20% Buffer (1150/100 x 20)	230	
g	Requirement for five years 2020-2025 with 20% buffer (e+f)	1380	276
	Supply:		
h	Commitments (large and small) at 1 April 2020 (net)	891	
i	All SHLAA sites (includes proposed allocations) (net figure)	1043	
m	Windfall allowance (67x2 years)	134	
n	Total Commitments (k+l+m)	2068	
o	Surplus (n-j) (2068-1380)	688	

Five year Housing Land Supply measured against 230 dwellings per annum (Submission Draft Worthing Local Plan (with 5% buffer).

	Submission Draft Worthing Local Plan	Dwellings (net)	Annual Average
a	Submission Draft Worthing Local Plan target 2020-2036	3672	230
b	Completed	0	
c	Number of years in plan period = 16		
d	Requirement 2020-2036 (a (3672) minus b (0))	3672	230
e	Five year target with no adjustment (230 x 5)	1150	
f	5% Buffer (1150/100 x 5)	57	
g	Requirement for five years 2020-2025 with 5% buffer (e+f)	1207	241
	Supply:		
h	Commitments (large and small) at 1 April 2020 (net)	891	
i	All SHLAA sites (includes proposed allocations) (net figure)	1043	
m	Windfall allowance (67x2 years)	134	
n	Total Commitments (k+l+m)	2068	
o	Surplus (n-j) (2068-1207)	861	

Appendix 8 – Density

The National Planning Policy Framework (NPPF) requires planning policies to promote an effective use of land in meeting the need for homes and other uses, while safeguarding and improving the environment and ensuring safe and healthy living conditions.

The NPPF allows local planning authorities to set their own density targets and it is considered appropriate that the Local Plan should contain a density policy. To ensure that the development potential of available land is optimised, the Plan must include the use of minimum density standards for town centres and other areas well served by public transport. These standards should seek a positive uplift in the average density of residential development unless it can be shown that there are strong reasons why this would be inappropriate.

Given the physical and environmental constraints in Worthing, land suitable for development is a scarce resource. There are competing demands for its use and it is important that the limited amount of previously developed land is used efficiently when considering proposals for new residential development.

The Council has considered a variety of evidence to ascertain what density levels are achievable going forward with an aspiration to deliver the new homes needed in a sustainable way and seeking to protect the intrinsic character of the town. Evidence of existing density of development covering areas with different development characteristics, the density of large developments in Worthing over the past 12 years together with data collated by West Sussex County Council has been used to justify setting a minimum density of 35 dph for development in Worthing. Policy DM2 in the Plan does however, recognise that there may be exceptional cases where a lower density might be more appropriate, for example in Conservation Areas, where applying the minimum density might result in an unacceptable impact on the character of the area. In addition, the evidence justifies the expectation that densities in excess of 100 dwellings per hectare can be achieved on mixed-use, flatted and those developments located in the town centre and in close proximity to public transport interchanges and local services.

Using robust evidence of past, proposed and planned development in the borough the data set out below helps to support the Council's approach.

A sample of densities within the existing built-up area of Worthing

A sample of densities within the built up area of Worthing was undertaken. The areas were chosen as a representative sample of the overall character of Worthing, including Conservation Areas and areas where particular house types dominate. Table 1 shows that densities range from 9 dph in part of the Offington Ward which is characterised by large detached dwellings with large gardens to 83 dph in part of the Heene ward with a mix of housing types including flatted developments. The average density across the built up area of the borough is 23 dph.

Table 1: Sample of densities within the existing built up area

Ward/Locations	Main Dwelling Type	Total Units	Site area (ha)	Gross Density
Offington	Bungalows	250	18.4	14
Offington	Large detached	141	15.2	9
Castle (The Quadrant)	Terraced	535	16.5	32
Castle	Terraced	247	6.0	41
High Salvington	Detached	294	27.8	11
Durrington	Semi-detached	269	11.8	23
Goring (The Plantation)	Detached	210	15.3	14
Northbrook	Smaller detached	217	6.9	31
Heene	Flats and mixed housing (Conservation Area)	1057	12.7	83
Marine	Large detached and purpose built flats	753	18.1	42
Marine	Semi detached	238	10.9	22
Tarring	Mixed terraced and semi detached	521	14.1	37
Tarring	Purpose built flats	124	1.9	62
Gaisford	Semi and detached	219	9.9	22
Selden	Large terraced and semi detached	353	7.2	49
Selden	Detached, semi- detached and purpose built flats	230	6.9	33
Broadwater	Ex Council terraced 1930's?	232	6.4	36
Broadwater	Semi and Terraced 1930's	489	18.2	27
Broadwater	Semi and terraced	298	8.6	34

The average density across the whole (which includes the area of South Downs National Park) = 15dph however it is considered more appropriate to consider the average density within the Built up Area Boundary which equates to 23dph.

West Sussex County Council Monitoring Information

West Sussex County Council produces annual housing monitoring information for Worthing. It also provide Information on the density of new development over time. Table 2 sets out the average densities achieved on sites of 1-9 units, 10 + units and then average density achieved across all sites. The data covers the period from 2006/07 to 2019/20. The evidence indicates that over this 14 year period sites of 1 to 9 dwellings have achieved an average density of 57dph, with larger sites of 10+ dwellings having a higher density of 79 dph. Overall, new development over this time period has achieved an average density of 60 dph which reflects the efficient use of land and in part the increase of flatted developments over recent years. The figures for new development are significantly higher than the prevailing density rates for existing dwellings (see table 1 above).

Table 2 Density of Development

Monitoring Year	1-9 Units			10 + Units			All Site Sizes		
	Number of Sites (gross units)	Area (Ha)	Average Density	Number of Sites (gross units)	Area (Ha)	Average Density	Number of Sites (gross units)	Area (Ha)	Average Density
2006/07	U(219)	2.68	81.7	U(90)	0.59	152.2	U(309)	3.27	94.5
2007/08	66(152)	2.43	62.6	11(170)	1.37	123.7	77(322)	3.8	84.6
2008/09	119(282)	4.1	68.7	11(164)	1.05	156.1	130(446)	5.15	86.5
2009/10	50(139)	1.86	74.6	6(139)	0.98	141.3	56(278)	2.85	97.6
2010/11	64(164)	2.8	58.6	5(107)	1.07	99.6	69(271)	3.87	70
2011/12	24(63)	0.96	66	4(89)	0.64	139.1	28(152)	1.6	95.3
2012/13	28(70)	1.08	64.8	9(115)	1.53	75	37(185)	2.61	70.8
2013/14	50(107)	2.21	48.4	8(152)	4.88	31.2	58(259)	7.09	36.5
2014/15	50(117)	2.12	55.1	15(321)	10.8	29.7	65(438)	12.92	33.9
2015/16	58(118)	2.01	58.6	22(387)	14.60	26.5	80(505)	16.61	30.4
2016/17	46(100)	1.79	55.8	15(259)	14.24	18.2	61(359)	16.03	22.4
2017/18	54 (130)	2.50	52.1	18(361)	11.90	30.3	72(491)	14.39	34.1
2018/19	41(110)	4.81	22.9	10(191)	6.57	29.1	51(301)	11.38	26.5
2019/20	34(61)	1.92	31.8	12(347)	6.06	57.2	46(408)	7.98	51.1
Average			57			79			60
Max			81.7			152.2			97.6
Min			22.9			18.2			22.4

Larger developments completed since 2008

Looking more specifically at individual large sites of 6 or more dwellings that have been developed since 2008, Table 3 indicates that the density of samples of new developments range from 48 dph on the large mixed site (houses and flats) on the former Worthing sixth form college site to 371 dph on the flatted development at Westmoreland House which was a former office building and the permission to convert to residential was approved under permitted development. Developments granted permission for new build flatted development (based on a sample of all large developments) achieved densities of between 73 and 209 dph.

Table 3: Examples of large developments completed since 2008

Site location	Ha	Dwellings (net)	dph	Description
Regency Apartments, 17-19 Crescent Road,	0.0905	19	209	Flatted development – mix of 1 and 2 bed flats.
The Eardley, 3 -10 Marine Parade	0.2052	34	165	Flatted development
14 St Botolphs Road	0.11	8	73	Flats – supported housing scheme.
Kings Quarter, Orme Road	0.39	65	167	Flatted development – mix of 1 and 2 bed flats.
13-25 St Dunstons Road	0.1	7	70	Terrace of 4 x 3 bed houses, 1 x 2 bed flat and pair of 2 bed houses.
Aspen Court 40 - 42 St Botolphs Road	0.14	14	100	Flatted development – 6 x 1 bed and 8 x 2 bed flats.
7 Langton Road	0.07	10	143	Flatted development- 10 x flats.
Worthing sixth form, Bolsover Road	5.6	269	48	Mixed development – 74 x 1 and 2 bed flats, 191 x 2,3 and 4 bed houses
130 Goring Road	0.05	6	120	Conversion of house to 6 flats.
Westmoreland House	0.21	78	371	Built under PD conversion of offices to flats.
Lloyds TSB	0.79	76	96	Flatted development
120 Dominion Road	0.07	13	192	Flatted development – 1 and 2 bed flats.
Land Rear Of 14 - 22 New Street	0.0367	7	190	5 x houses and 3 x flats
Goods Yard, Goring Street	0.57	29	51	Mixed – houses and flats
Irene House	0.2	22	110	Flatted development – 18 x 2beds and 4 x 1 beds.

In addition, work was undertaken to map the densities of larger sites approved and completed since 2008. The exercise involved assessing development completed since 2008 within a 500m radius of the main transport interchanges / retail areas in the borough and developments within the main Worthing Town Centre. These developments were then mapped and colour coded according to the level of density achieved. The density levels were grouped as follows:

- Below 35dph
- 35dph- 50dph
- 50dph – 100dph
- 100dph+

The map extracts below set out the results of the densities achieved and clearly demonstrates that these areas are already achieving the densities of 100dph plus as set out in Policy DM2 for mixed developments and development located within the town centre and in areas close to public transport interchanges.

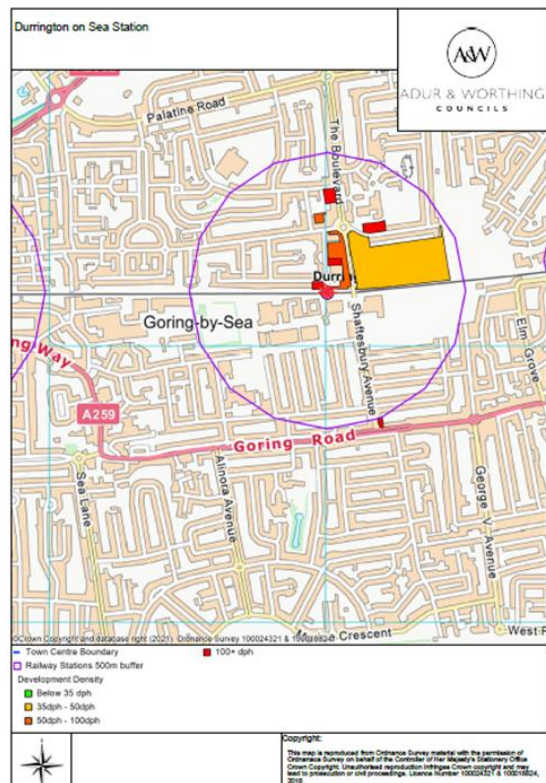
Map Key:

- Town Centre Boundary
- Development Density
 - Below 35 dph
 - 35dph - 50dph
 - 50dph - 100dph
 - 100+ dph

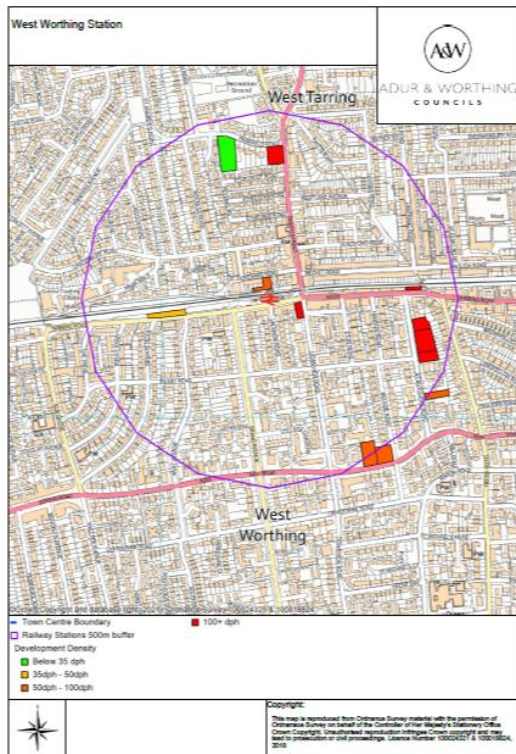
Goring Station



Durrington on Sea Station



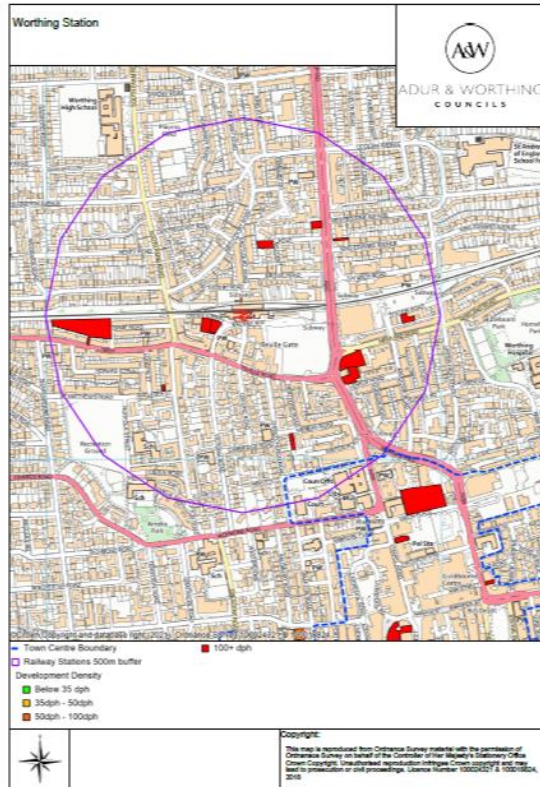
West Worthing Station



East Worthing Station



Worthing Station



Worthing Town Centre



Large sites at 1st April 2020

Table 4 below sets out a sample of the most up to date evidence of sites of 5 units +(prior to 2019 large sites were 6 units +) that either have planning permission or are under construction in the borough.

Table 4: A sample of large sites 5+ with planning permission/under construction at 1st April 2020

Site location	Hectares	Total Net Units	Dph	Description
Land South Of 6 Grand Avenue	0.26	24	92	Flatted seafront development
37-39 Chesswood Road	0.13	7	54	Flats and Houses
Scouts Hall, Anglesea St	0.012	6	500	Studio flats close to Worthing Station
The Aquarena Brighton Road	0.70	141	201	Flatted seafront development (previously council owned site)
7 The Steyne	0.057	9	158	Town centre part conversion part new development
12 Shelley Road	0.04	6	150	Change of use to flats close to town centre,
105 - 109 Montague Street	0.08	26	325	Town centre redevelopment.
EDF Southdownview Road	0.778	78	100	PD application conversion of offices to flats on edge of industrial estate.
Durrington New Life Church 113 Salvington Road	0.065	7	108	Redevelopment of former church.
Land South And East And West Of The Coach And Horses Arundel Road	11.70	240	21	Large greenfield development.
The Kingsway Hotel 117-119 Marine Parade	0.10	16	160	Mixed scheme part conversion part new build on seafront.

Local Plan Allocations

The current Core Strategy had only one allocation and that was the West Durrington development which comprised 700 dwellings. The Submission Draft Local Plan is proposing to allocate 15 sites with 12 of them delivering new homes.

West Durrington

This development is a large greenfield development on the edge of the borough. It is nearing completion and comprises 700 dwellings. It is the largest single development in Worthing. The site covers an area of 31 hectares of which 19.06 ha were for residential development with the wider development including playing fields and community facilities. In terms of the density the site as a whole achieves a density of 37 dph. However, the site comprises 13 residential parcels and a variety of density levels were proposed across the site as set out below:

- Density band 30-38 dph predominantly and mix of detached and semidetached houses. Heights of buildings limited to two storey except in key locations where a three storey building might act as a focal point.
- Density band 39-45 dph a greater percentage of semidetached and terraced house with some flats. Building heights predominantly two storeys with some two and a half storey.
- Density band 46-50 dph areas of highest density with a high proportion of terraced and linked houses and a mix that includes flats. A mix of heights between two storeys and two and a half with some grouping of three storeys.

Allocations in the Submission Draft Local Plan

The table (5) below sets out the proposed allocations that will deliver a level of residential development. It can be seen that the lowest density at current proposed capacity levels is 18 dph on the Titnore Lane (A13) site but it should be noted that this is a highly sensitive greenfield location in close proximity to the South Downs National Park, abutting Ancient Woodland and the woodland within and surrounding the site forms part of the Titnore and Goring Woods Complex Local Wildlife Site.

The highest density currently expected is 197dph at the Grafton Site (A7) which is a PDL site located on the seafront and within the town centre boundary. The average minimum density expected across all proposed allocations is 57 dph (given the mix of uses the density of residential development will actually be significantly higher than shown). When only those sites on PDL and solely for residential are considered, the average minimum density is expected to be 78dph.

Table 5 WLP - Site Allocations – Residential Density

WLP REF	Site Name	Location (PDL / GF)	Site Area (Net / Ha)	Developable Area (Ha)	Indicative Capacity – Dwellings (and any other uses on site)	Density (Dw/Ha)
A1	BEECHES AVENUE	- Edge of town - Greenfield	2.80	2.80	90	33
A2	CARAVAN CLUB, TITNORE WAY	- Edge of town - Greenfield	2.70	2.70	100	37
A3	CENTENARY HOUSE	- Edge of Local Centre - PDL	3.88	3.88	250 (10,000 sqm employment floor space)	64
A6	FULBECK AVENUE	- Edge of town - Greenfield	0.85	0.85	120	141
A7	GRAFTON	- Town centre - PDL	0.76	0.76	150 (2,500 sqm of commercial floorspace)	197
A8	HMRC OFFICES, BARRINGTON RD	- Edge of Local Centre - PDL	7.46	7.46	250 (Provision of Care Home / Sheltered accommodation)	34
A9	LYNDHURST ROAD	- Edge of town centre - PDL	1.13	1.13	150	133
A10	MARTLETS WAY	- Edge of Local Centre - PDL	4.18	1.18 ('Nib')	30	25
A11	STAGECOACH, MARINE PARADE	- Town centre - PDL	0.69	0.69	60 (2,000 sqm commercial / leisure floorspace)	87
A12	TEVILLE GATE	- Edge of town centre - PDL	1.47	1.47	250 (4,000 sqm commercial floorspace)	170
A13	TITNORE LANE	- Edge of town - Greenfield	6.90	3.35	60	18
A14	UNION PLACE	- Town centre - PDL	1.12	1.12	150 (700 sqm leisure & commercial floorspace)	134
A15	UPPER BRIGHTON ROAD	- Edge of town - Greenfield	7.50	4.15	123 dw	30

Edge of Town / Greenfield			
Sites	Total Site Area (Ha)	Total Capacity (Dw)	Density (Dw/Ha)
A1 / A2 / A6 / A13 / A15	13.85	493	36
PDL - Residential only			
Sites	Total Site Area (Ha)	Total Capacity (Dw)	Density (Dw / Ha)
A9 / A10	2.31	180	78
PDL - Mixed Use Development (* Note –given the mix of uses the density of residential development will actually be significantly higher than shown)			
Sites	Total Site Area (Ha)	Total Capacity (Dw)	Density (Dw/Ha)
A3 / A7 / A8 / A11 / A12 / A14	15.38	1110	72*
All Sites			
Total Site Area		Total Capacity	Density
31.54		1,783	57*

Conclusion

In setting a minimum target density for Worthing, a wide range of evidence has taken into account. It is considered that requiring new development to have a minimum density of 35 dwellings per hectare (dph) is appropriate and justified.

The evidence shows clearly that the density of development that has been delivered in Worthing in recent years is, on average, significantly higher than previous minimum density standards (and guidance). Furthermore, the evidence shows how, in general, the density rates have been increasing significantly and this is particularly so in the town centre and in areas well served by local facilities and public transport - this is very much in line with the Government's objectives set out in the NPPF. The Local Plan, when adopted, will help to ensure that efficient use is made of available land and that the delivery of relatively high density rates continues - with the highest rates being directed to the most sustainable locations. This is reflected in both the Development Management Policies and the capacity assumptions related to the site allocations.

Appendix 9 - Space Standards

In 2012 Worthing Borough Council adopted a Space Standards Supplementary Planning Document (linked below):

(<https://www.adur-worthing.gov.uk/media/Media,99159,smxx.pdf>) .

The purpose of the SPD was to ensure that the floor and storage area space in new residential developments and conversions in Worthing was sufficient to secure a satisfactory standard of accommodation for their residents. The need for this document was prompted by concerns that were being raised about some of the room sizes that had previously been getting approved locally in the absence of any local standards.

The SPD made it clear that although the document is a material consideration there could be some circumstances when there may be scope for some flexibility in how the guidance is applied if satisfactory justification can be given.

The SPD was consulted on and several representations challenged the need for such guidance. The Council's response was that it would simply not be good practice or 'good planning' to leave all design, size and layout issues in the hands of the housebuilders or the market. In addition, planning authorities were encouraged to progress guidance to address planning issues at the local level. The housebuilding industry had, in some instances, been progressing applications in Worthing that had resulted in what many would consider to be sub-standard /size accommodation. It was these concerns, and the need for local guidance / standards, that have acted as the driver for this document.

The standards established for Worthing were based on local research, national advice and existing space standards used by other authorities. It was made clear that compliance with these standards should not be seen as a 'burden' - it was simply a means of ensuring that homes of adequate and decent standards are being provided. If homes are of a good standard they are more marketable which is clearly in the interests of the developer. Research also indicated new minimum floor areas did not necessarily impact on the number of homes being delivered.

Since the adoption of the SPD the Council has been in a position to refuse applications that would result in sub-standard accommodation but has also exercised a degree of flexibility where there was a robust justification to do so. In March 2015 the Government published Nationally Described Space Standards (NDSS) that were very similar to those adopted in the SPD for Worthing. The NDSS provide the recognised standard for bedrooms, storage and internal areas in new dwellings across all tenures. Table 1 below sets out the NDSS and Table 2 the standards set out in the SPD:

Table 1 - National Described Space Standards

Number of bedrooms (b)	Number of bed spaces (persons)	1 Storey dwellings	2 Storey dwellings	3 Storey dwellings	Built – in Storage
1b	1p	39 (37) ²			1.0
	2p	50	58		1.5
2b	3p	61	70		2.0
	4p	70	79		
3b	4p	74	84	90	2.5
	5p	86	93	99	
	6p	95	102	108	
4b	5p	90	97	103	3.0
	6p	99	106	112	
	7p	108	115	121	
	8p	117	124	130	
5b	6p	103	110	116	3.5
	7p	112	119	125	
	8p	121	128	134	
6b	7p	116	123	129	4.0
	8p	125	132	138	

Source: Technical Housing Standards – nationally described space standards,

DCLG. March 2015

Table 2 – Standards set out in Space Standards Supplementary Planning Document**Space Standards by dwelling type (m2)**

Dwelling type / Number of bedrooms	Total minimum floor area	Storage space	Living, cooking & eating area	Sleeping area
Studio flat	32	1.5	22	7
One bedroom flat	51	2.5	22	12
Two bedroom flat	66	3.5	24	19
Two bedroom flat wheelchair flat	71	3.5	26	21
Two bedroom house	77	3.75	27	24
Three bedroom dwelling	93	4.5	30	31
Four bedroom dwelling	106	5.5	33	36

Notes: The total minimum floorspace is the gross internal floor area (GIA), being the space measured between the inside faces of the enclosing walls of the dwelling unit (measured

over space taken by private stairs, partitions, internal storage space, internal chimney breasts and heating appliances, conservatories and internal porches which form an integral part of the habitable space, and internal storage over 1.5m in height). It excludes garages, external storage areas, balconies, porches and lobbies open to the air, non-habitable basements and attics, and any accommodation (eg. sloping ceilings within the roofspace) where the ceiling height is less than 1.5m high (NB. Definition from HQI April 2008). Living rooms should not be narrower than 3.3m (from English Partnerships). Storage space: storage standards includes storage for buggies and child scooters.

To provide clarity (and some flexibility) since 2015 the Council has expected that relevant applications adhere to either the standards set out in the SPD or the NDSS. Unlike the Worthing SPD, the national standards do not provide information on external space standards and, therefore, Section 6 of the Council's SPD is currently taken into account when considering relevant applications.

The Submission Draft Worthing Local Plan recognises the importance of providing a good living environment for existing and future residents of developments. It acknowledges that the lack of good quality appropriate living and storage space can have a profound impact on occupant's health and wellbeing. Therefore, policy DM2 Density includes a requirement for all new residential development to meet the Nationally Described Space Standards as a minimum for all internal floor areas and storage space. However, for external space, the Council's local standards will continue to apply. There is some flexibility in the application of the policy requirement but only in very exceptional circumstances.

The requirement to meet the NDSS was factored into the Whole Plan Viability Assessment (WPVA) which concluded that, in general, the policy requirements would not impact on development to a degree that would make developments unviable (that otherwise would have been viable). Furthermore, the WPVA builds in an appropriate buffer / margin so that the requirements set out in the WLP are not set at the margins of viability and are able to support development when economic circumstances adjust.

It is noteworthy that the current Covid 19 pandemic has reinforced the importance of ensuring that new homes meet minimum standards to protect the wellbeing of current and future occupiers. The Council's Strategic Housing Market Assessment (2020) indicates that between 45-60% of new market homes should be 1 and 2 bed homes. In addition, it recognises the high percentage of older people in the local population and the expected significant level of growth that is expected. Whilst the Plan does make specific provision for the needs of specific groups it should be noted that homes that are smaller than the national standards are generally quite difficult to adapt for the use of grab rails and mobility devices. In addition they do not lend themselves to 'downstairs only' living, which can be an issue for people as they age. This requires ample room for both a separate bedroom and downstairs bathroom facilities. As such, it is important that new properties are built to the nationally described space standards to better allow for such adaptation in the future, to meet the needs of the aging population.

The justification for introducing the Space Standards in 2015 are still relevant today. In fact, given the greater intensification of development of land required to make a more sustainable use of land to provide the level of much needed housing they are arguable, of even greater importance. The Covid pandemic has brought to the fore the need for good quality internal and external space that meets the needs of current and future occupiers. New trends that have emerged or have grown significantly during the pandemic such as the greater move to home working will require suitable space within new homes. It is therefore considered

appropriate (and locally justified) to continue applying space standards to all new development.

Worthing Borough Council
Planning Policy
Portland House
44, Richmond Road
Worthing
West Sussex
BN11 1HS



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COUNCIL